

EXHIBIT 26

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DEPOSITION OF JOSE BLADIMIR CORTEZ DIAZ

taken on

Monday, June 17, 2019

JESSICA R. MUNOZ
CSR 13823

1 A No. We were just made to sign some papers.

2 Q Do you remember what those papers were?

3 A No.

4 Q Did you attend an orientation session?

5 A No.

6 Q Were you given the uniform?

7 A Yes.

8 Q And were you given undergarments?

9 A Yes.

10 Q Do you remember receiving a handbook from the
11 GEO Group?

12 A No.

13 Q Do you recall getting a handbook from
14 Immigrations and Custom Enforcement?

15 A No.

16 MS. STROTTMAN: I'm going to hand you an exhibit
17 that I'll mark as Exhibit 1.

18 (Exhibit 1 marked for identification and
19 is attached hereto.)

20 BY MS. STROTTMAN:

21 Q Do you recognize this document?

22 A Well, no. With so many papers that I've
23 signed, I don't know what all of these...

24 Q Okay. Does that look like your signature on
25 the bottom?

1 A Yes, that's my signature.

2 Q And are those initials your initials?

3 A Yes.

4 Q Okay. Does this refresh your memory as to
5 whether you received a handbook?

6 A No. Because when we went in, we were nervous
7 from the trip, from the transfer. We didn't know what
8 was going on. We just signed everything that was put on
9 the table in front of us.

10 Q Do you remember if the documents you received
11 were in English or Spanish?

12 MS. FLYNN: Objection. Vague.

13 THE WITNESS: I don't remember.

14 BY MS. STROTTMAN:

15 Q Do you recall watching a video when you
16 arrived?

17 A No.

18 Q How many other people did you arrive with?

19 A There were about 12 to 15 people, 12 to 15 of
20 us.

21 Q Do you recall if the staff there mostly spoke
22 to you in English or Spanish?

23 A Normally they always speak English.

24 Q And how much of that did you understand?

25 A Practically nothing. Other fellow detainees

1 Q On the day of the incident, was breakfast
2 provided?

3 A We didn't take it.

4 Q What time was breakfast?

5 A Breakfast is between six and seven o'clock in
6 the morning.

7 Q And can you -- do you normally go eat breakfast
8 anytime during that time period, or was there a specific
9 time?

10 A The food just arrives, and they have us -- and
11 they have us get in line in order to receive the food.

12 Q So did you get in line that day?

13 A No.

14 Q So instead of getting in line, what did you
15 do?

16 A I went to go sit at the table.

17 Q And do you know what time that was?

18 A It was in between six and seven o'clock in the
19 morning during that period of time. I don't know exactly
20 what hour.

21 Q Did you tell anyone that you were not taking
22 breakfast?

23 A It was -- when we sat down, we went and handed
24 the sheet to the officer.

25 Q Who handed the sheet to the officer?

1 A One of my fellow detainees took it to him,
2 where we were saying that we were doing a peaceful hunger
3 strike.

4 Q Which detainee took it, the paper?

5 A I don't recall.

6 Q Did you go to the podium?

7 A At some moment all of us in the group went
8 over, and then we sat down.

9 Q Who -- how many is all of you went to the
10 podium?

11 A There were nine of us that were doing this, but
12 I don't remember if all nine of us went over or if some
13 of us stayed behind. I don't recall.

14 Q Did you go up to the podium?

15 A Yes.

16 Q And did you say anything to the officer at the
17 podium?

18 A No.

19 Q You said that someone told the officer that you
20 were doing a peaceful hunger strike?

21 A Yes.

22 Q And who was that who said?

23 A A fellow detainee from Haiti. We went to look
24 for him to have him translate what we wanted to say to
25 him.

1 Q So who was the person who spoke in Spanish that
2 was then translated by the Haitian immigrant.

3 A A fellow detainee, Isaac.

4 Q And it was Isaac who said, "That we are on a
5 peaceful hunger strike"?

6 A He said that to the inmate from Haiti to have
7 him translate it to the officer.

8 Q Do you remember what Isaac's exact words
9 were?

10 A He said, "Tell him that we are handing him this
11 sheet of paper, that we're going to do a peaceful hunger
12 strike because we want to speak to an ICE officer."

13 Q Do you know this Haitian detainee before?

14 A He was a fellow detainee. I would see him
15 around there.

16 Q But you don't recall his name?

17 A No.

18 Q Whose idea was it for the hunger strike?

19 A Well, all-of us. In light of everything that
20 we were seeing that was going on at that center.

21 Q When did you come up with this idea?

22 A When we saw our bail amounts.

23 Q Did you have meetings with the other eight
24 inmates to plan for this hunger strike?

25 A We met in order to see what the -- what our

1 don't remember very well, but I think at 7:00 in the
2 morning.

3 Q So it's after breakfast?

4 A Yes.

5 Q So you knew that after breakfast, you were
6 supposed to go back to your bed for count?

7 MS. FLYNN: Objection. Calls for speculation.

8 THE WITNESS: Yes. But since we were -- we wanted
9 to be heard, and we wanted to speak to an ICE officer.
10 That's why we did not return to our beds.

11 BY MS. STROTTMAN:

12 Q So is count announced over the loud speaker?

13 A The officer just says, "Count."

14 Q And on June 12, 2017, did an officer call for
15 count?

16 A Count time, yes.

17 Q And you did not go back to your bed; is that
18 correct?

19 A We did not go back because we wanted to see the
20 ICE officer.

21 Q Is there a reason why you didn't ask to see an
22 ICE officer later in the day?

23 A No. Because we needed to be heard. We had a
24 problem with -- a problem with the inefficiencies that
25 they had at the center for what we lacked. And so we

1 A Well, we were at the table. The lady arrived,
2 and, well, she was yelling in English. And she pulled
3 out the gas from -- the pepper gas, and she was hitting
4 it against the table.

5 Q Did you understand anything she was saying?

6 A No.

7 Q Had you ever seen any officers use pepper spray
8 at Adelanto before this date?

9 A No.

10 Q When you were planning the hunger strike, had
11 you ever discussed the possibility that they may try to
12 remove you from the tables?

13 A Well, we never imagined that because, well,
14 what they did to us, you don't even do that to an
15 animal.

16 Q Did you ever imagine, though, that they would
17 ask you to leave the tables?

18 A We did imagine that, but they didn't ask for
19 that.

20 Q How do you know they didn't ask for that?

21 A Well, they didn't say it in Spanish. I don't
22 know if they said it in English.

23 Q And what happened after the woman in the white
24 shirt came in and hit this pepper spray on the table?

25 A Well, she continued yelling in English. She

1 yelled several times. She went around us, around the
2 table. And after that she called on the radio and
3 requested -- they requested more guards.

4 Q How do you know she requested more guards?

5 A No. What I mean is that she called on the
6 radio and more guards arrived, so that's why I'm saying
7 that she requested guards.

8 Q And what happened after that?

9 A Well, the guards stood around us, and they
10 started digging their nails behind into -- behind our
11 ears. They were digging their nails into our hands right
12 here, as well (indicating). And, well, all we did was
13 just hold hands, all of us, the whole group, and they
14 started forcing us -- using force.

15 Q So while you were planning this hunger strike,
16 you didn't imagine that they would use any force?

17 A Never.

18 MS. FLYNN: For the record, when he was talking
19 about them -- I don't know what the exact word was, like
20 squeezing or pinching his hand between -- on the outside
21 and inside of the hand, between the thumb and the pointer
22 finger.

23 MS. STROTTMAN: Okay.

24 BY MS. STROTTMAN:

25 Q So where do you claim that they were -- can you

1 could not access personal e-mail?

2 A No, ma'am.

3 Q So the only e-mail, to your knowledge, that you
4 could access at work in the watch office was the GEO
5 e-mail?

6 A Yes, ma'am.

7 Q On the morning of June 12th, 2017, if you
8 recall, did you receive any memos or e-mails that you
9 needed to convey to your staff?

10 A I don't recall.

11 Q Do you recall whether anyone called off that
12 day?

13 A I do not recall.

14 Q After you got ready for shift, what is the next
15 thing you did that morning?

16 A Went into shift briefing. And, basically, let
17 everybody know they were -- where they were posted at
18 that day and anything that may have happened the night
19 before.

20 Q Were shift briefings -- strike that.

21 Did you conduct a shift briefing at the
22 beginning of every shift?

23 A Yes, ma'am.

24 Q And that was throughout your time at Adelanto?

25 A Yes, ma'am.

1 Q Okay. And how long were they holding?

2 A They would let go, and then they would pull us,
3 and they would apply pressure again several times.

4 Q And do you know what officer that was?

5 A No.

6 Q Can you describe what other physical force you
7 claim that the officers used against you?

8 A They also pinched us. They would grab us here
9 from the sides of our ribs (indicating), and they would
10 pull our skin.

11 Q Anything else?

12 A That's all.

13 Q And when you alleged that they were grabbing
14 your sides, was that to pull you away from the table?

15 A With the same -- so they would grab us here and
16 apply pressure and pull us back, but with force
17 (indicating).

18 MS. FLYNN: I want to put in an objection that calls
19 for speculation.

20 BY MS. STROTTMAN:

21 Q When you say "here," I'm just trying to make
22 sure that we have this recorded, so you are pointing to
23 your --

24 A On my side where my ribs are.

25 Q So you've now described digging nails behind

1 your ear, pressure -- using force on your hands, and then
2 pulling, grabbing the sides of your ribs?

3 A Yes.

4 Q Okay. And that's -- any other force that you
5 recall personally being used against you?

6 MS. FLYNN: Objection. Vague.

7 THE WITNESS: That was before the pepper gas and the
8 pulling that they did on us.

9 BY MS. STROTTMAN:

10 Q Okay. And so do you claim you were sprayed
11 with pepper spray?

12 A Yes. Quite a lot on myself.

13 Q Okay. Where were you -- where do you claim
14 that you were sprayed?

15 A First, she sprayed -- first, she sprayed the
16 table in general. After that since we just put our face
17 down on the table, the lady started to -- one by one, she
18 would shake it and then go like this (indicating)
19 until -- and the guards were pulling us to remove us.

20 Q What parts of your body do you claim were hit
21 with the pepper spray?

22 A It wasn't hit. It got into my face and my
23 mouth because when it hit me, I screamed out, and it went
24 into my mouth and into my eyes as well.

25 MS. FLYNN: Did he say "me echo"?

1 THE INTERPRETER: This is the interpreter speaking.

2 M-e space e-c-h-o, which is she sprayed me.

3 BY MS. STROTTMAN:

4 Q Okay. So what happened after you were
5 sprayed?

6 A When she sprayed my face, I got up, and I was
7 screaming, and because I couldn't see -- so as I was
8 screaming, some more pepper gas went into my mouth.

9 The guards came over and grabbed me by my hands
10 and handcuffed me behind me, and pulled me out, took me
11 out.

12 Q Do you allege that you were injured in any
13 other way while you were being pulled out?

14 A Just my arms were hurting, this here
15 (indicating), because they were grabbing my hands and
16 pulling my hands back hard by force, and then they
17 handcuffed me.

18 Q Did you hit the ground at any time?

19 A No.

20 Q Do you know how many officers were used to
21 remove you from the room?

22 MS. FLYNN: Objection. Vague.

23 THE WITNESS: No, I don't know. My eyes were
24 closed.

25 BY MS. STROTTMAN:

1 Q So before the officer started using pepper
2 spray, could you see what the other inmates, who were not
3 at the table, were doing?

4 A The fellow dorm inmates?

5 Q Yes.

6 A They were in their beds.

7 Q Did you hear if they were saying anything or
8 shouting anything?

9 A When they started spraying us with the gas,
10 they started yelling at them that what they were doing is
11 not correct, that it was not legal. And the lady just
12 yelled at them too and threatened them with the spray
13 that if they -- she passed it at them like this
14 (indicating), like if she wanted to spray it at them,
15 throw it at them as well.

16 Q Did she threaten them verbally?

17 A She tell yelled at them in English. And she
18 moved the container of pepper gas like this (indicating).

19 Q Could you understand what she was saying in
20 English?

21 A No.

22 Q Before she started spraying you, did the
23 inmates in the dormitory say something? Could you hear
24 them say anything?

25 A No. They were just watching.

1 MS. STROTTMAN: Okay. So it's 12:30 right now. So
2 we can take our lunch break.

3 (Interruption in the proceedings.)

4 MS. STROTTMAN: I'm going to show you the video of
5 the incident, and then I'm just going to show different
6 sections to see if you can help identify the different
7 individuals on the video; okay? Are you able to see the
8 screen?

9 THE WITNESS: Yes.

10 MS. STROTTMAN: So currently we are looking at
11 camera angle East 2-C 2. And the time on here is 6:22
12 a.m.

13 MS. FLYNN: You said 6:22?

14 MS. STROTTMAN: Yes.

15 BY MS. STROTTMAN:

16 Q So do you recognize this view right here?

17 A Yes.

18 Q Okay. And can you describe what this room
19 is?

20 A That's the tank we are in. For example, on
21 this side this is where my bed was at the at bottom.

22 Q And "by this side," do you mean to the right
23 hand?

24 A To the right, yes.

25 Q And was your bunk on the bottom level?

1 MS. STROTTMAN: You can answer.

2 THE WITNESS: Well, like I said, that's what was
3 said verbally to the guard.

4 BY MS. STROTTMAN:

5 Q Is there any reason why this wasn't written
6 down?

7 A Really, another sheet of paper was also handed
8 in with the names of the fellow detainees, but I don't
9 know where that sheet of paper ended up. I don't know
10 what the guard did with it.

11 Q What did that sheet of paper say?

12 A That's where all of our names were on. And
13 that, if I'm not mistaken, that's where it said that we
14 were starting the hunger strike.

15 Q Oh, so there's another paper?

16 A There's another sheet of paper that was handed
17 to the guard. I don't know.

18 Q So there were three sheets of paper handed to
19 the guard?

20 MS. FLYNN: Objection. Misstates the testimony.
21 Lacks foundation. Argumentative.

22 THE WITNESS: That was the presentation of the sheet
23 of paper, but I don't know what they did with it.

24 BY MS. STROTTMAN:

25 Q But I'm asking. So the sheet of demands that

1 Q Did the officers take -- did you have water
2 bottles at your table?

3 A I don't recall. I think so. I don't remember,
4 but I think so, yes.

5 Q Was your plan to drink water during your hunger
6 strike?

7 A Not on my part. I don't know about my other
8 fellow detainees.

9 Q Did anyone request a Spanish translator when
10 the officers were -- came to the table?

11 A No.

12 Q Why not?

13 MS. FLYNN: Objection. Calls for speculation.

14 THE WITNESS: Because if people are going to work at
15 detention centers, it's obvious that these are going to
16 be migrants. They're not going to speak English. So the
17 people that need to work there need to speak both
18 languages.

19 BY MS. STROTTMAN:

20 Q At 6:38 a.m., it appears that you are holding
21 hands; is that correct?

22 A We held hands, yes.

23 Q And why did you do that?

24 A Because by then they were pulling on the other
25 fellow detainees.

1 Q -- other than Officer Lacy?

2 A Yes, ma'am.

3 MS. AGUADO: Calls for speculation. It's a
4 minor issue --

5 BY MS. STEINBACK:

6 Q Based on your experience and understanding, and
7 you believe it looks like those are consistent with
8 Captain McCusker's handwriting?

9 MS. AGUADO: Objection. She's not an expert on
10 handwriting.

11 MS. STEINBACK: I'm not calling her an expert.
12 I'm just saying based on her experience.

13 MS. AGUADO: How can you say based on your
14 experience does a specific writing look like someone
15 else's? It doesn't really make sense.

16 But you can go ahead and answer.

17 MS. STEINBACK: Sure. And if you could just
18 keep to proper objections, just so that --

19 MS. AGUADO: Okay.

20 MS. STEINBACK: -- we can keep this going, that
21 would be great.

22 BY MS. STEINBACK:

23 Q So based on your experience, having read
24 Officer McCusker's -- Captain McCusker's handwriting,
25 you believe that the "Jane" and the "Lakeishia" were

1 written by Captain McCusker?

2 MS. AGUADO: Calls for speculation.

3 Go ahead.

6 BY MS. STEINBACK:

7 Q Sure. But it looks like it might be Captain
8 McCusker's handwriting --

9 MS. AGUADO: Objection. Calls --

10 BY MS. STEINBACK:

11 Q -- as with the other reports?

12 MS. AGUADO: Calls for speculation.

13 BY MS. STEINBACK:

14 Q I'm just asking for your opinion on what it
15 looks like.

16 A It's unknown.

17 Q Okay. Sure. I'm going to now give you
18 Plaintiffs' Exhibit 6, which is Bates stamped GEO 02270.

19 (Plaintiffs' Exhibit 6 was marked
20 for identification.)

21 BY MS. STEINBACK:

22 Q Do you recognize this report?

23 A Yeah. General incident report.

24 Q Did you review this report before today's
25 deposition?

1 Q Did you review this report before today's
2 deposition?

3 A Yes, ma'am.

4 Q Is that your signature at the bottom of the
5 page?

6 A Yes, ma'am.

7 Q Are there any notations or words on this
8 document that were created by you?

9 A No, ma'am.

10 Q And as with the other reports, does it appear
11 to you that, in the first box, the "use of force"
12 notation in the parenthetical was created by Captain
13 McCusker?

14 A McCusker, yes, ma'am.

15 Q Thank you. Is there anything else on this
16 document that looks to you like it might have been added
17 by Captain McCusker?

18 A No, ma'am.

19 MS. STEINBACK: I'm going to tender to the
20 deponent Exhibit 8, which has Bates range GEO 02251
21 through GEO 2253.

22 (Plaintiffs' Exhibit 8 was marked
23 for identification.)

24 BY MS. STEINBACK:

25 Q Do you recognize this report?

1 A Yeah. General incident report.

2 Q Did you review this report before today's
3 deposition?

4 A Yes, ma'am.

5 Q Okay. Is that your signature at the bottom of
6 this page?

7 A Yes, ma'am.

8 Q Okay. Are there any words or notations on this
9 document that you created?

10 A No, ma'am.

11 Q Are there any words or notations on this
12 document that appear to you to have been added by
13 Captain McCusker?

14 A No, ma'am.

15 Q Okay. And this report was authored by a
16 sergeant, not an officer; is that correct?

17 A Yes, ma'am.

18 Q Was this a sergeant who you regularly
19 supervised?

20 A No, ma'am.

21 Q Had you ever supervised Sergeant Campos?

22 A No, ma'am.

23 Q Was this the first time you had ever met
24 Sergeant Campos?

25 A No, ma'am.

1 THE WITNESS: Unknown. I do not know why.

2 BY MS. STEINBACK:

3 Q So that was not the protocol, for Officer
4 Lanuza to give it directly to the chief of security?

5 MS. AGUADO: Objection. It's misstating her
6 testimony.

7 Go ahead.

8 THE WITNESS: Unknown why.

9 BY MS. STEINBACK:

10 Q Did it violate protocol, as you understood it
11 to exist at Adelanto --

12 A No.

13 Q -- for Officer Lanuza to give this directly to
14 Chief of Security Johnson?

15 A No.

16 Q What was the protocol for report reviews in
17 June of 2017?

18 MS. AGUADO: Based on your understanding.

19 THE WITNESS: Like I said, it's unknown why
20 this went to him.

21 BY MS. STEINBACK:

22 Q Should it have gone to you first?

23 A Unknown why it went to him. I'm not sure why
24 it went to him first.

25 Q Would you, based on your experience and your

1 gas. The showers that they had there were hot water, and
2 we were like that for around five days.

3 We needed to take the bed sheet off of the
4 mattress in order to be able to lay down and feel the
5 coolness because we felt the vapor that was burning our
6 body, or else we would just lay on the ground because
7 they weren't giving us anything.

8 Q So how long -- you said -- you said you felt
9 the effects of the pepper spray for five days?

10 A Between four to five days because every time
11 they would take us to the showers, the showers were hot.
12 They didn't give us anything to take it away. My fellow
13 inmate Julio, he came the next day, and he was just
14 writhing around on the floor after the shower because he
15 couldn't handle it, and I was fanning him with a shirt.

16 Q Did you give any statements during the
17 investigation?

18 MS. FLYNN: Objection. Vague.

19 THE WITNESS: I don't recall.

20 BY MS. STROTTMAN:

21 Q And this was your first hunger strike; is that
22 correct?

23 A Yes.

24 Q Do you claim that you had problems with the
25 phones after the incident on June 12th?

1 A All numbers were blocked.

2 Q Did you have problems calling people before the
3 incident?

4 A Not before. We would speak normally, but then
5 after that, all of the numbers were blocked.

6 Q Who were you trying to call?

7 A A friend and my sister in-law.

8 Q Did you have -- did you have their phone
9 numbers?

10 A I had them written down. And, yes, the
11 number -- the call wasn't going out. Remember it had
12 been blocked. In fact, even my attorney's number was
13 blocked as well.

14 Q I thought you said you didn't have your
15 sister-in-law's phone number?

16 A Afterwards once I spoke to one of my friends,
17 he got me my sister in-law's number, but I didn't have
18 the numbers for the rest of my family.

19 Q So what was your attorney's name that you tried
20 to call?

21 A John "MacClure."

22 Q And what was the name of your friend that you
23 were trying to call?

24 A Alex.

25 Q Is that Alex "Mensing"?

1 A Yes.

2 Q Was he part of an immigrant's rights group?

3 A Yes. He was -- he supports migrant people, and
4 he was supporting me to get me an attorney because I
5 didn't have a way to pay for an attorney.

6 MS. FLYNN: We are going to take a quick break.

7 Were you done with your answer?

8 THE WITNESS: Yes.

9 (Interruption in the proceedings.)

10 BY MS. STROTTMAN:

11 Q How did you meet Alex?

12 A In Mexico.

13 Q So you met him before you came to the United
14 States?

15 A Yes.

16 Q And how did you meet him in Mexico?

17 A I got into a caravan, and he was already in
18 that caravan.

19 Q Were you ever able to get a hold of Alex after
20 the incident by phone?

21 A I was able to contact him afterwards because
22 there was just one phone number that they were not able
23 to block from a journalist, Pilar, from the La Opinion
24 newspaper.

25 And I called her to have her contact Alex as

1 calls to. After the incident, all numbers were blocked.

2 Q All numbers that you had previously called?

3 A Yes.

4 Q But not phone numbers that you had not called
5 before?

6 A Uh-huh.

7 Q Is that correct?

8 A Yes.

9 Q So were you ever able to reach your sister
10 in-law after the incident?

11 A With her, it already stopped, and my brother
12 too. She was going to be my sponsor, but then she said
13 that she couldn't help me. She gave in, and she said she
14 could no longer help me. And then I stopped bothering
15 her because she said that she couldn't.

16 Q But my question was: Were you able to call her
17 after the incident?

18 A No.

19 Q Were you able to call, in fact, John MacClure?

20 A When he came out to visit me, I told him that
21 that number was blocked. And, well, I don't know what he
22 did at Adelanto, but they unblocked his number.

23 Q Anyone else, specifically, whose phone number
24 was blocked?

25 A I no longer remember.

1 | answering.

2 So during the time that you were a lieutenant
3 at Adelanto, you never corrected -- made corrections to
4 any of your officers' reports before giving them to your
5 captains?

6 MS. AGUADO: Objection. It's been asked and
7 answered. She's testified that she corrected spelling.

8 You can go ahead and respond again.

11 BY MS. STEINBACK:

12 Q Okay. So you never had to correct, for
13 example, factual inaccuracies?

14 A No, ma'am.

15 Q So you feel like your officers did a pretty
16 good job reporting what had happened?

17 A Yes, ma'am.

18 Q Great. And they included all the relevant
19 details?

20 A Yes, ma'am.

21 MS. STEINBACK: I'll tender to the deponent
22 what's been marked as Plaintiffs' Exhibit 11. It's
23 Bates-stamped GEO 2236 and 2237.

24 (Plaintiffs' Exhibit 11 was marked
25 for identification.)

1 Q And by that, I mean, since you started working
2 at Adelanto?

3 A Yes, ma'am.

4 Q How did -- were you told that you needed to
5 fill out a use-of-force report?

6 A Yes, ma'am.

7 Q Who told you that?

8 A Captain McCusker.

9 Q Did you know that you were going to need to
10 fill out a use-of-force report before Captain
11 McCusker told you to do it?

12 A I knew, but I didn't know how to fill it out.
13 So he assisted me with it.

14 Q So did you go to Captain McCusker and say,
15 "Captain, I have to fill out a use-of-force report. Can
16 you help me?" or how did it unfold?

17 A No. He came to the watch office to assist me.

18 Q When was that?

19 A Right after the incident.

20 Q How did he know to come to the watch office to
21 find you?

22 A Because I was in the watch office having my
23 officers write all this out and trying to find this on
24 the computer. And he told me we had to do a use of
25 force.

So you printed it out, and then what happened?

A Then we filled it out.

Q So he filled it out with you?

A Yes, ma'am.

Q Had he been present for the incident?

MS. AGUADO: If you know.

THE WITNESS: I don't believe he was in the unit when this happened. No, ma'am.

BY MS. STEINBACK:

Q Could you take the highlighter that I've given you and highlight all of the words and notations on here that you made.

(Witness complied.)

BY MS. STEINBACK:

Q Okay. If I may look at it?

A There you go.

Q Thank you.

A You're welcome.

Q Looking at this, it might have been easier to just ask you to highlight what he did.

So just for the record, there are no highlights on page 1 indicating that the deponent did not make any of the marks on page 1, which is Bates-stamped GEO 2236.

I want to make sure that the record is accurate. So on page GEO 2237, you've highlighted, it

1 looks like -- would it be correct to say all of the
2 officers written -- whose names are written under
3 Confrontation Avoidance?

4 A Yeah.

5 Q Okay. You also highlighted the N/A under Force
6 Cell Team Members.

7 A Uh-huh.

8 Q And the next box, asking if the incident was
9 videotaped, it looks like you highlighted the wording
10 next to no.

11 A Uh-huh.

12 Q And could you read that for the record, the --
13 what you wrote on this.

14 A Uh-huh.

15 Q Thank you.

16 A Okay. "No video camera. Recorder" -- they
17 recorded through our central control. They had access
18 to their cameras in there. That was it. We didn't have
19 a video camera present.

20 Q Okay. So just -- in terms of the box that you
21 were just reading, do you mind just reading into the
22 record just so that we all know the exact words that you
23 wrote.

24 A "No video camera."

25 Q Okay. What other -- are there any other words

1 in that box that you wrote?

2 A Our recorder -- the recorder was through our
3 central control camera.

4 Q So those are all the words that you wrote in
5 that box?

6 A Yes, ma'am.

7 Q Okay. In the box below it, it looks like you
8 highlighted -- did you highlight everything in that box?

9 A Yes, ma'am.

10 Q Okay. And if you could just read it for the
11 record so that we all know exactly what it is that you
12 wrote.

13 A Let's see. "Staff carry." Let's see. "R.
14 Gillon -- he had restraints. G. Martinez, used physical
15 force by pulling the detainees apart that had locked
16 arms."

17 Q What about above that?

18 A Okay. It says "Hard restraints used. This is
19 what are" -- that's all it says. I don't know what --

20 Q Okay.

21 A -- what that is.

22 And then Burks assisted to separating the
23 detainees. Marmolejo assisted in restraining the
24 detainees with restraints.

25 Q With hand restraints?

EXHIBIT 27

ORIGINAL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA MARTINEZ;)
ISAAC ANTONIO LOPEZ CASTILLO;)
JOSUE VLADIMIR CORTEZ DIAZ;)
JOSUE MATEO LEMUS CAMPOS; MARVIN)
JOSUE GRANDE RODRIGUEZ; ALEXANDER)
ANTONIO BURGOS MEJIA; LUIS BARAHONA)
CORNEJO, as individuals,)
Plaintiffs,)
vs.) CASE NO. 5:18-cv-
THE GEO GROUP, Inc., et al.,) 01125-R-GJS
Defendants.)

WEBCAM DEPOSITION OF OMAR ARNOLDO RIVERA MARTINEZ

Taken on

Thursday, June 6, 2019

REPORTED BY:

Amber Pilson, CSR 13992

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1 A. Quite frankly, I just didn't want to be with
2 her. I didn't want to be with her anymore.

3 Q. So were you called to court for a criminal
4 accusation or for divorce?

5 A. Yes, because of my wife.

6 MS. ALARCON: Just wait until she finishes
7 translating before you answer.

8 THE WITNESS: Yes.

9 BY MS. COLEMAN:

10 Q. Were you convicted of any criminal charges?

11 A. Yes.

12 Q. What?

13 A. Theft.

14 Q. Is that theft or robbery?

15 MS. ALARCON: Objection. Lacks foundation;
16 calls for legal conclusion.

17 You can answer.

18 THE WITNESS: Yes, I can answer, but it was not
19 robbery because had it been robbery, I would have gotten
20 many years.

21 MS. ALARCON: If I can ask that the interpreter
22 translate the objection as well so the witness is aware
23 of what I said.

24 THE INTERPRETER: I will do that.

25 //

1 A. All right.

2 Q. What did you see yourself doing on the video?

3 A. I was sitting down. Then I would stand up.

4 Q. When you saw yourself sitting on the video,
5 where were you?

6 A. Are you asking me about the place?

7 Q. Yes.

8 A. In Adelanto Detention Center in Central
9 California.

10 Q. It's in Adelanto, isn't it?

11 A. Yes.

12 Q. When you saw yourself on the video, were you at
13 one of the tables in the dayroom?

14 A. Yes, I was there. Yes.

15 Q. Which table were you at in the dayroom?

16 A. The second one.

17 Q. The second one from the bottom on the video?

18 A. I was sitting at the second table.

19 Q. What side of the table were you sitting at?

20 A. I was sitting at the first seat of the second
21 table.

22 Q. On the left or on the right?

23 A. To my -- to my right hand.

24 Q. Is that -- when you were watching the video,
25 were you on the right side of the table on the video?

1 A. No, ma'am.

2 Q. You said you asked an ICE officer. Where was
3 that?

4 A. In Adelanto, California.

5 Q. So were they all ICE officers?

6 A. No, ma'am.

7 Q. I asked you if you saw ICE and GEO officers,
8 and you said "No."

9 A. Yes, ma'am, but ICE officers is one thing and
10 GEO officers another thing.

11 Q. And Adelanto had both?

12 A. Yes.

13 Q. Could you tell the difference?

14 A. Well, of course I did.

15 Q. How?

16 A. You want me to say something?

17 Q. Yes. How could you tell the difference between
18 ICE and GEO officers?

19 A. Because the GEO officers are in uniform, and
20 the others are not.

21 Q. What do the ICE officers wear?

22 A. Just clothes like the ones we are in right now.

23 Q. Jeans and a T shirt?

24 A. Yes. The types of pants that I'm wearing right
25 now.

1 Q. I'm sorry. I can't see them.

2 What type of pants are you wearing?

3 A. Jeans.

4 Q. Did you ever file a grievance related to the
5 food at Adelanto?

6 A. Yes, ma'am.

7 Q. When?

8 A. On several occasions, I did that.

9 Q. In writing?

10 A. Yes, ma'am, but we would do it as a group.

11 Q. Like on the day of the incident?

12 A. Yes.

13 Q. Did you ever file a grievance by yourself about
14 the food?

15 A. No, ma'am.

16 Q. What was your complaint about the food?

17 A. That the rice was hard; they were giving us
18 very little food sometimes; most of the time, the food
19 was not well cooked; sometimes the chicken would be
20 bloody; and the at the end, it was very little food.

21 Q. Any other complaints about the food?

22 A. No.

23 Q. What did they feed you for breakfast usually?

24 A. Piece of fruit.

25 Q. Anything else?

1 Q. You said, "He, himself, sent me somewhere
2 else."

3 Who are you referring to?

4 A. Well, just to say, in other words, he said, "I
5 don't want to help you with this case."

6 Q. That was the dentist right?

7 A. Also the ICE officer. I put in a grievance and
8 I explained it to him, and he says, "No, I don't want to
9 help you with this either."

10 Q. Was that in writing?

11 A. Yes.

12 Q. Did you ever have any problems with the medical
13 care not the dental care?

14 A. Yes. Quite frankly, the nurses they don't help
15 you out. They just do whatever. If you are sick, they
16 don't pay attention to you. That's the truth because
17 they say to us, "You are immigrants that are coming to
18 our country." Until we got to the point where we
19 demanded to see a doctor, but they don't send you until
20 whenever.

21 Q. What do you mean "whenever"?

22 A. If the nurse likes you, they're going to take
23 you in real quickly. If not, they're just going to keep
24 you there waiting.

25 Q. Did the nurse like you?

1 your body.

2 Q. Okay. We have two negatives there, so I want
3 to clarify this: After you were pepper sprayed, how long
4 was it before you showered?

5 A. Almost three weeks, ma'am.

6 Q. You're saying you did not have a shower on the
7 day of the incident?

8 A. No, ma'am.

9 Q. Were you offered a shower after the incident?

10 A. Yes, ma'am, but I didn't want to do that
11 because I could see my friends.

12 Q. You could see them what?

13 A. The water is hot and the gas -- the gas on your
14 body feels like you're dying.

15 Q. That is what you heard?

16 A. I saw it with my eyes that my friends showered
17 after the incident. I would see my friends crinkle with
18 their bodies, and somebody said to me, "Don't shower."

19 Q. Who told you that?

20 A. My friend.

21 Q. Do you know their name?

22 A. Yes.

23 Q. What was the name of your friend who told you
24 not shower?

25 A. Julio.

1 Q. Were you taken out of handcuffs to change?

2 A. Yes, ma'am. At the time of the incident, we
3 were handcuffed at all times.

4 Q. When were you taken out of handcuffs?

5 A. Just for me to take my clothes off.

6 Q. And then were you put back in handcuffs?

7 A. Yes, ma'am.

8 Q. When were the handcuffs taken off next?

9 A. At that point because they had put them
10 really -- it was like it was stuck.

11 Q. It was tight?

12 A. Yeah.

13 Q. So they took the handcuffs off for you to
14 change and then put the handcuffs back on?

15 A. Yes, ma'am.

16 Q. Were the handcuffs put on loose or --

17 A. No, ma'am. We then asked them because they
18 were really tight.

19 Q. The handcuffs were tight before you changed and
20 after?

21 A. Yes, ma'am.

22 Q. How long did you have the handcuffs on after
23 you changed?

24 A. I don't remember ma'am.

25 Q. Can you estimate?

1 A. No, ma'am. I don't remember.

2 Q. Was it more than an hour?

3 A. No, ma'am. It was more, but I don't remember.

4 Q. When you were put into a cell, were your
5 handcuffs taken off?

6 A. No, ma'am, I was taken to the hole.

7 Q. Do you mean administrative segregation?

8 MS. ALARCON: Objection. Calls for
9 speculation; lacks foundation.

10 THE WITNESS: Yes. The cell for punishment,
11 but before that, a commander took my picture.

12 BY MS. COLEMAN:

13 Q. Who took your picture?

14 A. A commander.

15 Q. What is a commander?

16 A. A chief, a supervisor that gives orders in the
17 institution.

18 Q. Were you seen by medical after the incident?

19 A. Yes, ma'am.

20 Q. Were you in handcuffs when you saw medical?

21 A. Yes, ma'am.

22 Q. Were the handcuffs in front or in back?

23 A. We were taken like this, and then the officer
24 is grabbing us.

25 Q. So you were handcuffed behind your back?

1 speculation.

2 THE WITNESS: I don't know, ma'am. The only
3 thing I know is that you're locking all the time, and
4 then you get about 15 minutes out in the yard, and that's
5 it. That's why we call it "the hole."

6 BY MS. COLEMAN:

7 Q. You said "you're looking" all the time, or
8 locked up?

9 A. Yes, ma'am.

10 Q. You do not have to call me "ma'am" all the
11 time.

12 A. Sorry.

13 Q. Didn't you get an hour of exercise time per
14 day?

15 A. We would only get 15 minutes or half an hour.
16 We were restricted about going out because of the strike.

17 Q. Were you ever told you were put in
18 administrative segregation so that they could investigate
19 the incident?

20 A. Yes, ma'am.

21 Q. And you're saying you only got 15 minutes and
22 not one hour of yard time per day?

23 MS. ALARCON: Objection. Misstates his
24 testimony and calls for speculation.

25 THE WITNESS: Ma'am, the only thing I know is

1 that we were being punished. I mean, we wanted to go out
2 to the yard. We didn't know whether we were going to get
3 15 minutes or one hour or two hours because the officers,
4 the ones that are watching over us -- keeping watch over
5 us, they were restricting.

6 BY MS. COLEMAN:

7 Q. What was restricted?

8 A. In going out, ma'am.

9 Q. You said the officers were restricted?

10 A. They would tell us so, that we could not go
11 out.

12 Q. I think my original question is whether you got
13 15 minutes or an hour.

14 A. The truth of the matter is I don't know, ma'am.

15 Q. How long were you in administrative
16 segregation?

17 A. From administrative, we were punished for ten
18 days.

19 Q. So you were in that unit for ten days?

20 A. Yes.

21 Q. And how long after that were you sent to Theo
22 Lacy?

23 A. So this was in 2018, and it was -- not even two
24 months. I don't remember very well.

25 Q. So two months or so later, you were sent to

1 on June 12th. I don't want to make a mistake, but it was
2 on a Monday, days before.

3 Q. The day before?

4 A. No, ma'am.

5 Q. So how many days before did you and the other
6 eight talk about writing up your complaint?

7 A. Quite frankly, a week before. I'm not going to
8 lie.

9 Q. And you guys talked about writing up your
10 complaints and your demands?

11 A. Yes, ma'am.

12 Q. What was the plan on the hunger strike?

13 A. Quite frankly, it was a bail that had been set
14 for my friends was the detail that we were all talking
15 about, \$50,000 bail -- 45, 40, 35, 30 -- and I was the
16 only one who -- for whom no bail had been set.

17 Q. You had no bail, or it hadn't been set yet?

18 A. I had not received the paperwork. When the
19 paperwork was received, I was in segregation.

20 Q. What was the amount of your bail?

21 A. Nothing. No bail was set.

22 Q. Never?

23 A. No.

24 Q. Do you know why?

25 A. I don't know.

1 an officer should tell someone "motherfucker."

2 Q. Say that again?

3 A. I don't think that an officer that is working
4 in a center, like a GEO, should say motherfuckers.

5 Q. Did you hear officers say that?

6 A. Many times.

7 Q. Did anyone say that to you?

8 A. Yes.

9 Q. I heard him laugh, but I didn't hear an answer.

10 Did he say yes?

11 THE INTERPRETER: Yes.

12 BY MS. COLEMAN:

13 Q. Any other mistreatment that you're referring
14 to?

15 A. As I said -- no, just that.

16 Q. What were the other issues for your group, the
17 other problems that you discussed?

18 A. Well, the officers, whether they're men or
19 women working there, they would mistreat us. They didn't
20 care. They would just get a plastic bag, and they would
21 throw away everything that they would find.

22 Q. During the cell inspections?

23 MS. ALARCON: Objection. Calls for
24 speculation.

25 THE WITNESS: No, ma'am.

1 be paid of the bail?

2 A. No, ma'am. At that point, I didn't hear
3 anything like that.

4 Q. You didn't hear anything -- you said you didn't
5 hear anything?

6 A. No.

7 MS. COLEMAN: I'm sorry. Sometimes I can't
8 hear you, the translation.

9 THE INTERPRETER: I'm sorry. I'm trying to
10 speak into the microphone.

11 MS. COLEMAN: I know you're facing towards him,
12 so.

13 THE INTERPRETER: Okay.

14 BY MS. COLEMAN:

15 Q. So when you talked with the group about writing
16 up your complaints, who ended up writing the letter?

17 A. All together, ma'am.

18 Q. Was it your writing on the letter?

19 A. No, ma'am.

20 Q. Whose writing was it?

21 A. I don't know that, ma'am.

22 Q. Did you agree with what was written?

23 A. Yes, ma'am.

24 Q. And who went to the podium to hand the letter
25 to the officer on the morning of June 12, 2017?

1 THE WITNESS: Yes. She was a supervisor. She
2 oversees other officers that are there.

3 | BY MS. COLEMAN:

4 Q. Do you know her name?

5 A. No.

6 Q. Can you estimate how many officers were with
7 her?

8 A. I don't know that, ma'am.

9 Q. I'm asking if you can estimate; not a
10 calculation. I'm asking for an estimation.

11 A. I cannot estimate. I'm sorry.

12 MS. COLEMAN: Is *calcular* to estimate?

15 BY MS. COLEMAN:

16 Q. Were there more than five officers?

17 A. Quite frankly, I don't know. I can't estimate.

18 Q. How long ago did you see the video last?

19 A. I just saw it yesterday.

20 Q. When you saw the video, can you tell how many
21 officers were there?

22 A. I did see the video, but I didn't pay attention
23 to the number of officers.

24 Q. What happened after the officers came in and
25 the woman with the spray can?

1 A. She approached me first.

2 Q. And then what happened?

3 A. She sprayed it on my face.

4 Q. She sprayed pepper spray on your face?

5 A. Yes.

6 Q. How far away was she from your face?

7 A. About this distance. She stretched out her
8 arm, and then she sprayed.

9 Q. How far was the pepper spray can or bottle from
10 your face?

11 A. It was very close, ma'am.

12 Q. How close?

13 A. Ma'am, I'm telling you that it was very close.
14 I cannot tell you how many meters or what distance.

15 Q. Well, you just made a hand motion when you
16 described how far away she was.

17 Can you do the same thing with how far away the
18 bottle was?

19 A. I already told you that it was close.

20 Q. Can you show us how close?

21 A. Ma'am, I already told you that it was very
22 close, and I don't want to look back and remember the
23 woman who did that to me. It's very hard.

24 Q. I'm going to be asking you a lot of details
25 about this. If you need to take a break before we get

1 Okay. So you had your forearm down on the
2 table and your head?

3 A. Yes, I was like this.

4 Q. And your head was not all the way down on your
5 arm but part way down?

6 A. Yes. Like so.

7 Q. Okay. So you're showing me the forehead a few
8 inches away from your arm?

9 A. Yes.

10 Q. And then she came up with the pepper spray, and
11 it was how far away from you?

12 A. This distance, from here to there.

13 Q. I can't say what you're pointing to.

14 Can you take the water bottle and put it where
15 the pepper spray was from you?

16 And your head was down a little bit?

17 A. Yes.

18 MS. COLEMAN: Okay. So, Counsel, would we
19 estimate that about one foot away?

20 MS. ALARCON: That's right.

21 MS. COLEMAN: What did you say?

22 MS. ALARCON: "That's right."

23 BY MS. COLEMAN:

24 Q. And where did the pepper spray hit you?

25 A. Here.

1 Q. And you're pointing to your forehead and your
2 right eye?

3 A. All over my face.

4 Q. Did it land on your forehead and then drip
5 down?

6 A. Yes.

7 Q. Do you know how many seconds she sprayed?

8 MS. ALARCON: Objection. Vague as to which
9 time.

10 BY MS. COLEMAN:

11 Q. The first time, if there was more than one, if
12 you know.

13 A. I don't know.

14 Q. Okay. What happened next?

15 A. The officers grabbed me to take me out, but
16 they were beating me. They also --

17 Q. How many officers grabbed you?

18 A. Two of them took me out.

19 Q. How did they grab you?

20 A. From my shoulders and then turning me like so.

21 Q. And you're showing us your arms behind your
22 back?

23 A. Yes.

24 Q. Were they holding you underneath your arms from
25 your armpit area?

1 A. Yes, from here.

2 Q. From here, where?

3 A. From my arm, but really hard.

4 Q. Were they holding your biceps?

5 A. Yes.

6 Q. Was there one officer on each arm?

7 A. Yes, but they were mistreating me because they
8 wanted to take me outside.

9 Q. How did they mistreat you?

10 A. They took me to a hallway, and they hit me in
11 my face, and that's where they broke my nose.

12 Q. How many officers hit you in the face?

13 A. Two. They did it against the wall.

14 Q. So they pinned you against the wall?

15 A. Yes.

16 Q. They did not punch you?

17 A. No. They would do like this.

18 Q. And when you said "like this," you were making
19 a motion of pushing you against the wall?

20 A. Yes. They pushed me against the wall.

21 Q. One time or more than once?

22 A. More than one time.

23 Q. How many times?

24 A. Perhaps some four times.

25 Q. Where did your face hit?

1 A. Against the wall.
2 Q. What part of your face?
3 A. Here.
4 Q. You're pointing to the bridge of your nose?
5 A. Yes.
6 Q. All four times the same place?
7 A. Yes. That's where my crown came loose -- came
8 out.

9 Q. Where did you have a crown?
10 A. There's several. Down there, and then these
11 ones here.
12 Q. A crown normally is just one tooth.
13 Is that what you're referring to?
14 A. I have more down here.
15 Q. Was that a bridge?
16 A. Yes.
17 Q. Was that real teeth or false teeth in the
18 bridge?
19 A. They are my teeth.
20 Q. In the bridge, were there any false teeth?
21 A. No, ma'am.
22 Q. That's my understanding of a bridge, that,
23 normally, there's at least two teeth that aren't yours.
24 Can you explain to me what your understanding
25 is what you had on the lower teeth?

1 side?

2 A. Yes.

3 Q. On the left side?

4 A. Yes.

5 Q. But you have all your other teeth except for
6 one; right?

7 A. Yes.

8 Q. You just don't have the gold anymore?

9 A. Not anymore. It got lost. I don't know where
10 it is.

11 Q. Have you seen it since the incident?

12 A. No.

13 Q. Why did you have gold in your mouth?

14 A. Why did I have gold in my mouth? I don't know.
15 I wanted to have that put in in my country.

16 Q. You liked how it looked?

17 A. Yes, and the military men likes things like
18 that.

19 Q. Did any of your actual teeth break during the
20 incident?

21 A. Yes, ma'am. This one.

22 Q. Which tooth?

23 A. This one in the middle.

24 Q. In the middle front?

25 A. Yes, because I had two original of my own

1 Q. How were you feeling?

2 A. I was crying. I was kind of trying to open my
3 eyes trying to see what was going on.

4 Q. Do you mean crying, or were your eyes watering?

5 A. My eyes were tearing because of the gas.

6 Q. What about your nose?

7 A. My nose, I couldn't feel my nose because the
8 gas was covering all my face.

9 Q. How was your breathing?

10 A. It's bad up to the present time.

11 Q. You are having problems breathing right now?

12 A. Yes, ma'am.

13 Q. Have you gone to a doctor about it?

14 A. Yes. They took an X-ray, and the doctor said
15 that it was fractured, and then they sent me out and said
16 that they were going to do surgery on me.

17 Q. On your nose?

18 A. Yes, but, you know, said to me, "Don't go
19 because they're going to kill you," so then I got scared.

20 Q. Who told you that?

21 A. Who told me that?

22 Q. Yes.

23 A. An officer who watched the video and was not in
24 agreement with what the woman did.

25 Q. What was that officer's name?

1 Q. All over your body?

2 A. Yes, ma'am.

3 Q. What about your eyes? How long did they bother
4 you?

5 A. All the time, ma'am.

6 Q. Ten days?

7 A. Yes.

8 Q. And afterwards, did they bother you?

9 A. Yes, ma'am. Yes, after the ten days, I was
10 showering three times a day, but that wasn't going away.

11 Q. So after ten days, you did shower; right?

12 A. I was showering three times a day so that it
13 would go away, but the soap was affecting me even more --
14 it was affecting me more.

15 Q. How did the soap affect you?

16 A. It burns. It's like putting soap in your eyes.

17 Q. Did you put soap in your eyes?

18 A. I said it felt as when you put soap in your
19 eyes.

20 Q. Were you using hot or cold water to shower?

21 A. Hot, ma'am. There's only hot water there.

22 Q. There's only hot water to shower?

23 A. Yes, ma'am.

24 Q. Was it hot or warm?

25 A. Hot. Hot from the shower.

1 A. I don't know, ma'am. I'm not going to answer
2 that question.

3 Q. You need to answer the question if you know the
4 answer.

5 A. I don't know the answer, ma'am.

6 Q. You don't know who the leader was?

7 A. No, ma'am.

8 Q. Out of the nine people, was there a leader?

9 A. No, ma'am.

10 Q. Everyone decided together?

11 A. Yes, ma'am.

12 Q. Did you have a hearing for your disciplinary
13 violation?

14 A. I didn't have a date. They carried that out
15 separately.

16 Q. Did you go to a hearing?

17 A. No, ma'am. The officers made the determination
18 of the number of days I was going to be segregated.

19 Q. Did you have an opportunity to make a
20 statement?

21 A. No, ma'am.

22 Q. Have you engaged in any other hunger strikes?

23 MS. ALARCON: Objection. Vague as to time.

24 BY MS. COLEMAN:

25 Q. At Adelanto?

1 Q. How often did you speak to her while you were
2 at Adelanto?

3 A. I would always talk to her.

4 Q. When you were in administrative segregation
5 after the incident, did you have any problems speaking to
6 her?

7 A. Yes, ma'am.

8 Q. Describe the problem.

9 MS. ALARCON: Objection. Misstates his
10 testimony.

11 BY MS. COLEMAN:

12 Q. He said he had problems while he was in
13 administrative segregation talking to her. I'm asking
14 him to describe what the problems were.

15 MS. ALARCON: We can have the court reporter
16 read it back. I understood that you asked whether he
17 spoke to her.

18 Do you mind reading it back?

19 (The record was read by the Court
20 Reporter as follows:

21 "Q When you were in administrative
22 segregation after the incident, did you
23 have any problems speaking to her?"

24 MS. ALARCON: You can answer.

25 //

1 BY MS. COLEMAN:

2 Q. Go ahead.

3 A. Because they started blocking the phone
4 numbers, yes, ma'am.

5 Q. They blocked what phone numbers?

6 A. My attorneys, my other attorney, my ex-wife,
7 many attorneys, and my daughters.

8 Q. Why do you believe the numbers were blocked?

9 A. Because the machine would say you cannot make
10 that phone call.

11 Q. Do you have to put in money?

12 A. I always handled my own money when I was in
13 Adelanto.

14 Q. I'm just asking if there could have been some
15 problem other than the number being blocked and reaching
16 them?

17 A. Ma'am, they blocked those numbers and not until
18 I submitted a kite, but a long time passed before they
19 unblocked the numbers.

20 Q. How much time passed before the numbers --
21 before you could call the numbers?

22 A. They did not unblock the numbers. They just
23 unblocked my ex, my daughters, and my attorney Nicole
24 Ramos.

25 Q. They unblocked the numbers that you asked them

1 to unblock?

2 A. Yes, but most of the numbers from my phone,
3 they did not.

4 Q. Why did you have a second attorney?

5 A. Because those are the people that have helped
6 me.

7 Q. Were they both immigration attorneys?

8 MS. ALARCON: If you know.

9 THE WITNESS: I don't know, ma'am.

10 BY MS. COLEMAN:

11 Q. So the other attorney, what was the other
12 attorney's name?

13 A. Alex MENSEEN. [Phonetic.]

14 Q. And you don't know if he was an immigration
15 attorney?

16 A. No, ma'am.

17 Q. Have you gone to doctors since your release
18 from Adelanto?

19 A. No, ma'am.

20 Q. Do you have any other injuries from the
21 incident that you haven't told us about?

22 A. No, ma'am.

23 Q. Did any doctors tell you that your injuries
24 would be permanent?

25 A. No, ma'am.

1 Q. That's because of the fracture in your nose
2 that you have labored breathing?

3 A. Yes, ma'am.

4 Q. And by fracture, do you mean a hard blow or do
5 you mean a broken nose?

6 A. It's a broken nose, ma'am.

7 Q. Have you had any injuries since June 2017?

8 A. No, ma'am.

9 Q. What kind of work do you do now?

10 A. What type of work?

11 Q. Yeah. Do you work?

12 A. Yes, ma'am.

13 Q. What type of work?

14 A. Lately, I've been a chef, but lately, the last
15 few days, I've had another type of work -- job.

16 Q. What type?

17 A. I've been receiving construction material,
18 writing it down in a book.

19 Q. Do you have to load or unload things?

20 A. No, ma'am.

21 Q. Have you had any emotional distress from the
22 incident?

23 A. Yes, ma'am.

24 Q. Can you describe it?

25 A. Yes, ma'am. To think that the gas thing, that

1 is to say, I've never lived through something like that
2 before.

3 Q. The pepper spray and the incident was worse
4 than anything you've gone through before?

5 MS. ALARCON: Objection. Misstates his
6 testimony.

7 THE WITNESS: Yes, ma'am.

8 BY MS. COLEMAN:

9 Q. Did you ever see anything bad in the military?

10 A. Yes, ma'am, but that is completely separate
11 from the case.

12 Q. I'm asking -- but it's related to your
13 emotional distress, so when you were in the military, did
14 you ever go to some place where they had dead bodies, for
15 example?

16 A. Oh, yes, ma'am.

17 Q. And was that difficult to see?

18 A. Oh, yes, ma'am.

19 Q. Did you ever have to shoot anyone?

20 A. I believe that shooting someone -- how could I
21 say that? As far as I am concerned, that is a crime.
22 Only if I were to find someone robbing a bank. How could
23 I explain this to you? I can't.

24 Q. If someone was committing a crime or trying to
25 hurt someone, it might be justified to shoot someone, but

1 administrative segregation, have you lost any sleep
2 because of the incident?

3 A. If I have lost any sleep?

4 Q. Yeah.

5 A. Yes, ma'am.

6 Q. Can you give me a little more detail?

7 A. Thinking that somebody through gas in my eyes,
8 I never thought or imagined that something like this
9 would happen to me.

10 Q. I'm asking about your lost sleep.

11 MS. ALARCON: I'm going object as
12 argumentative. The witness is describing his damages
13 related to his sleep.

14 BY MS. COLEMAN:

15 Q. How has it affected your sleep?

16 A. Ma'am, it's just that I keep thinking a lot
17 about how is it possible that they threw gas at me, at my
18 eyes?

19 Q. How much did you used to sleep before the
20 incident per night on average?

21 A. Well, before this happened to me, at
22 7:00 o'clock in the evening, I was already asleep.

23 Q. And what time did you wake up?

24 A. At 5:00 or 6:00 in the morning.

25 Q. And was that your schedule at Adelanto before

1 the incident?

2 A. Yes. Yes, ma'am. I would just get up to get
3 some food, and then I would go back to sleep.

4 Q. Was that your schedule at Adelanto or in
5 El Salvador?

6 A. That was my schedule in El Salvador.

7 Q. And once you got to Adelanto, how was your
8 sleep?

9 A. It was normal. I would go to bed, and I would
10 go to sleep.

11 Q. And you slept from 7:00 P.M. to 5:00 A.M. at
12 Adelanto?

13 A. Maybe a little later. Maybe at 9:00 because
14 there's so much noise that you can't go to sleep.

15 Q. So you would go to sleep later than 7:00 P.M.?

16 A. Yes, ma'am.

17 Q. So how many hours of sleep a night would you
18 get?

19 A. I slept a few seven hours, six hours.

20 Q. Six to seven hours?

21 A. Yes.

22 Q. Okay. Was it -- was it a little bit difficult
23 to sleep there because of the noise and the people?

24 A. Yes, ma'am.

25 Q. And then after the incident, how many hours a

1 night did you sleep?

2 A. I couldn't sleep, ma'am.

3 Q. At all?

4 A. No, ma'am. I would only sleep for about three
5 hours during the day.

6 Q. And how long did that occur?

7 A. Ma'am, since that happened, I just couldn't go
8 to sleep at night.

9 Q. So, even now, you get three or four hours of
10 sleep a night?

11 MS. ALARCON: Objection. Misstates his
12 testimony.

13 THE WITNESS: Nowadays, I'm going to go to
14 sleep at maybe 1:00 o'clock in the morning.

15 BY MS. COLEMAN:

16 Q. And when do you wake up?

17 A. At 6:20.

18 Q. Okay. So that's almost five hours of sleep.
19 Why do you go to sleep?

20 THE INTERPRETER: I'm sorry. Say that again?

21 BY MS. COLEMAN:

22 Q. It's almost five hours of sleep; right?

23 A. Sometimes. Because sometimes I'm awake as late
24 as 3:00 o'clock.

25 Q. Is that because of your job as a chef?

1 A. No, ma'am.

2 Q. Why are you awake so late?

3 MS. ALARCON: Objection. It's been asked and
4 answered.

5 THE WITNESS: I can't sleep, ma'am.

6 BY MS. COLEMAN:

7 Q. Have you tried any medication?

8 A. No, ma'am, nor do I want to.

9 Q. Have you tried therapy or talking to anyone?

10 A. No, ma'am.

11 Q. Are there any other effects of the emotional
12 distress other than thinking about it and not being able
13 to sleep that you still have?

14 A. No, ma'am.

15 Q. Were you ever pepper sprayed directly in your
16 mouth?

17 A. No, ma'am.

18 Q. What about were you ever sprayed directly in
19 your nose?

20 A. No, ma'am.

21 Q. What about the groin? Were you ever directly
22 sprayed in the groin?

23 A. No, ma'am.

24 Q. Were you ever slammed on the floor?

25 A. No, ma'am.

1 STATE OF CALIFORNIA)
2) ss.
COUNTY OF LOS ANGELES)

3

4 I, Amber Pilson, Certified Shorthand Reporter
5 License No. 13992, for the State of California, do hereby
6 certify:

7 That, prior to being examined, the witness
8 named in the foregoing deposition, to wit, OMAR ARNOLDO
9 RIVERA MARTINEZ, was by me through the interpreter duly
10 sworn to testify to the truth, the whole truth, and
11 nothing but the truth;

12 That said deposition was taken down by me in
13 shorthand at the time and place therein named and
14 thereafter reduced to computer-aided transcription under
15 my direction;

16 That the foregoing transcript, as typed, is a
17 true record of the said proceedings.

18 I further certify that I am not interested in
19 the event of the action.

20

21 WITNESS my hand this 22nd day of June, 2019.

22



23 _____
24 Amber Pilson, CSR NO. 13992
25

EXHIBIT 28

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA MARTINEZ;)
ISAAC ANTONIO LOPEZ CASTILLO;)
JOSUE VLADIMIR CORTEZ DIAZ; JOSUE)
MATEO LEMUS CAMPOS; MARVIN JOSUE)
GRANDE RODRIGUEZ; ALEXANDER)
ANTONIO BURGOS MEJIA; LUIS PENA)
GARCIA; JULIO CESAR BARAHONA)
CORNEJO, as individuals,)
)
Plaintiffs,)
)
vs.) CASE NO.
) 5:18-cv-01125-R-GJS
)
THE GEO GROUP, Inc., a Florida)
corporation; the CITY OF)
ADELANTO, a municipal entity;)
GEO LIEUTENANT DURAN, sued in her)
individual capacity; GEO)
LIEUTENANT DIAZ, sued in her)
individual capacity; GEO SERGEANT)
CAMPOS, sued in his individual)
capacity; SARAH JONES, sued in)
her individual capacity; THE)
UNITED STATES OF AMERICA; and)
DOES 1-10, individuals,)
)
Defendants.)
_____)

DEPOSITION OF ALEXANDER ANTONIO BURGOS MEJIA

taken on

FRIDAY, MAY 17, 2019

EVELYN V. HERNANDEZ, CSR NO. 12615

1 were you given any documents?

2 A Can you repeat the question.

3 Q When you arrived at this facility, were you given
4 any documents?

5 A Only a bracelet.

6 Q Did you review any documents?

7 A I'm not sure.

8 Q For purposes of the record, this is bate stamped
9 GEO 00921. Do you recognize this document?

10 A No. Maybe it was given to me. But it was not
11 given to me in Spanish.

12 Q Is that your signature on the bottom?

13 A Yes.

14 Q Above your signature, is that English or Spanish?

15 A Spanish.

16 Q Okay. Can you read Spanish?

17 A Yes.

18 Q So did you read this document?

19 A No.

20 Q You just signed it?

21 A Yes, because the officer just gave you the
22 document and said, sign, sign, sign, and that was it.

23 Q Okay. So you never actually read this document,
24 you just signed it?

25 A Correct.

1 Q When the female came in, did she say anything to
2 you?

3 A That I can remember, she spoke in English, and I
4 didn't understand anything.

5 Q Even though you don't speak English, do you know
6 if she were giving you instructions to go to your bunk?

7 A No.

8 Q You don't know if she was giving you instructions?

9 A No.

10 Q Was she speaking to the people at your table
11 though?

12 A She was talking in English. She was screaming not
13 talking softly.

14 Q Did you understand why she was screaming?

15 A No.

16 Q Did you think that maybe she was screaming because
17 you were not complying with the instructions to go to the
18 bunks?

19 MS. ALARCON: Objection. Calls for speculation.

20 THE WITNESS: What was the question?

21 BY MS. AGUADO:

22 Q When she was screaming, in your own head, did you
23 think maybe she's screaming because we're not complying
24 with the instruction to go back to our bunks?

25 A Yes.

1 Q How many times did she scream at you?

2 A I don't remember.

3 Q More than once?

4 A I'm not sure.

5 Q More than twice?

6 A She was screaming and I didn't understand
7 anything.

8 Q How long was she screaming?

9 A I don't remember.

10 Q More than a minute?

11 A I'm not sure.

12 Q You have no idea how long she was screaming?

13 A No.

14 Q And you don't know how many times she screamed?

15 A No, because she started screaming and screaming.

16 Q Okay. Did anyone respond to her? And by
17 "anyone," I mean, the people at your table.

18 A No.

19 Q Did anyone at the second table respond to her?

20 A Not that I can remember.

21 Q After she walked up to your table and started
22 screaming, what happened next?

23 A She started spraying pepper gas.

24 Q How long elapsed, how much time was it from the
25 time she walked up to your table to the time that she

1 A Not that I remember.

2 Q Have you been sprayed in the face before by OC
3 spray?

4 A Could you be more specific with the question?

5 Q How many times in your life have you been sprayed
6 by OC spray or pepper spray?

7 A Only in Adelanto.

8 Q Only this one time?

9 A Correct.

10 Q And you don't remember if you were sprayed
11 directly in the face?

12 A I don't remember.

13 Q It seems like a pretty significant event, right,
14 would you agree?

15 MS. ALARCON: It's argumentative.

16 THE WITNESS: What's the question?

17 BY MS. AGUADO:

18 Q Did she spray you directly in the face?

19 A Not that I remember.

20 Q Okay. Did she spray you directly in the mouth?

21 A Not that I remember.

22 Q Did she spray you directly in your nose?

23 A I don't remember.

24 Q Where did she spray you?

25 A To be honest, I don't remember.

1 Q Did she spray you in your groin?

2 A I don't remember.

3 Q Was your entire body soaked with spray?

4 A I don't remember. I had my face down and when I
5 felt the pepper gas, it was on my shoulders and my face.

6 Q Why did you put your face down?

7 A Because I saw that she started moving her hands
8 and the other ones were complaining.

9 Q You saw that she was moving her hands, how was she
10 moving her hands?

11 A When she hit on the table with the pepper gas.

12 Q So when you saw her hit on the table with the
13 pepper gas, you put your face down?

14 A Correct.

15 Q So it was your understanding that she was going to
16 use the pepper gas; is that correct?

17 MS. ALARCON: Misstates his testimony.

18 THE WITNESS: What?

19 BY MS. AGUADO:

20 Q Why did you put your face down?

21 A Because when she hit the table, she started
22 spraying with the pepper gas.

23 Q Was your head down before she started spraying
24 with the gas?

25 A Which table?

1 Q What table were you at?

2 A The first one.

3 Q Okay. I'm talking about you. So why would I be
4 talking about the second one?

5 A Because she started spraying with the pepper gas
6 at the other table.

7 Q I'm talking about why you put your head down. Did
8 you put your head down at the first table, the only table
9 that you were at, before she sprayed?

10 A Before she started spraying me, yes.

11 Q Why did you put your head down?

12 A Because I saw that she was spraying with pepper
13 gas and the other detainees were screaming.

14 Q So you knew there was pepper gas in that can?

15 A Yes.

16 Q After you felt the gas on your shoulders and face,
17 what happened next?

18 A Would you be more specific with the question,
19 please?

20 Q What did you do next, after you were sprayed,
21 after you felt the gas on your shoulder and face?

22 A What I did was just put up with it, and then the
23 officers came and with my fellow detainees, we just crossed
24 our arms because the officers started hitting us on our
25 sides and our ribs, and then they started hitting me behind

1 my ear. They also twisted my arm backwards and pulled me
2 to take me out and before leaving the tank, they threw me
3 up against the wall and I hit the right side of my face and
4 I twisted my neck.

5 Q Before the woman sprayed, it was your
6 understanding that you were supposed to go to your bunk,
7 correct?

8 MS. ALARCON: Asked and answered.

9 THE WITNESS: Yes.

10 BY MS. AGUADO:

11 Q After she sprayed, why didn't you get up and go to
12 your bunk?

13 A Can you repeat the question?

14 Q After she sprayed and you felt it on your
15 shoulders and face, why didn't you get up and go to your
16 bunk?

17 A Because the officer started grabbing us and
18 hitting us in order to remove us.

19 Q How many officers hit you?

20 A I don't remember.

21 Q More than one?

22 A I don't know.

23 Q And where were you hit?

24 A In my ribs.

25 Q Which side, left side or right side?

1 A Right side.

2 Q Were you hit anywhere else?

3 A Behind my ear.

4 Q Which side of your head?

5 A Right.

6 Q How many times were you hit in the ribs?

7 A I don't remember.

8 Q More than once?

9 A Yes.

10 Q More than twice?

11 A I don't remember.

12 Q More than three times?

13 A I'm not sure.

14 Q How many times were you hit on the ear on the

15 right side?

16 A I don't remember.

17 Q More than once?

18 A I'm not sure.

19 Q Were you hit in the ear?

20 MS. ALARCON: It's been asked and answered.

21 THE WITNESS: Yes.

22 BY MS. AGUADO:

23 Q So at least once?

24 A Several times.

25 Q Twice?

1 A I don't remember.

2 Q But you know it was several times?

3 A Correct.

4 Q Were you hit anywhere else?

5 A When they threw me against the wall, they hit my
6 face.

7 BY MS. AGUADO:

8 Q I said, "hit." Were you hit anywhere else?

9 A The hits on my ribs, my ear, and when they twisted
10 me and they were pulling on me.

11 Q Was it the same officer that hit your rib on the
12 right side that hit your ear on the right side?

13 A I don't remember.

14 Q Do you know if there were more than one officer
15 that hit you?

16 MS. ALARCON: Objection. It's been asked and
17 answered.

18 THE WITNESS: I don't remember.

19 BY MS. AGUADO:

20 Q As you sit here today, you can only remember at
21 least one time that you were hit in the ribs on the right
22 side; is that correct?

23 A No, because it was several times.

24 Q But you can only remember one specific time?

25 A Not that I remember.

1 Q Do you know if the officers were trying to put on
2 some sort of handcuffs or some kind of restraints?

3 MS. ALARCON: Objection. Calls for speculation.

4 THE WITNESS: Can you start again.

5 BY MS. AGUADO:

6 Q After you got up from the table and your arm was
7 behind your back, were they trying to put handcuffs on you?

8 MS. ALARCON: Objection. Calls for speculation.

9 THE WITNESS: I was handcuffed after the whole
10 thing was over.

11 BY MS. AGUADO:

12 Q After you were taken out of the tank?

13 A No. After I was hit.

14 Q You said that you were only hit while you were
15 seated. So at what point were you handcuffed?

16 A After I was thrown against the wall.

17 Q How many officers threw you against the wall?

18 A I don't remember.

19 Q When you say that you were thrown against the
20 wall, did they push you, did they actually pick you up and
21 throw you, what do you mean?

22 A They pulled my arm out and they pushed me against
23 the wall.

24 Q Which arm?

25 A The right one.

1 Q What was your left arm doing at this time?

2 A I just had it just normally.

3 Q At the present time was your left arm behind your
4 back?

5 A I don't remember.

6 Q When you stood up from the table, when you got up
7 from the table and the officers were walking you out, were
8 you complying with them?

9 A When they took me out, I was already handcuffed.

10 Q From the time you got up from the table to the
11 time you went to the wall, were you complying with the
12 officers?

13 A Correct.

14 Q You were doing exactly what they wanted you to do?

15 A Yes.

16 Q Were you resisting in any way?

17 A At no time.

18 Q So you said that they put your arm up and pushed
19 you against the wall?

20 A Correct.

21 Q Did your feet lift the ground?

22 A No.

23 Q What side of your face touched the wall?

24 A The right side.

25 Q How long were you against the wall for?

1 A I'm not sure.

2 Q After your face touched the wall, what happened?

3 A They handcuffed me.

4 Q What happened next?

5 A They took me to the area where it was the
6 recreation area where we could play soccer and they made me
7 sit down on the floor while they were checking the other
8 ones.

9 Q Was there an officer near you when you were in the
10 recreation yard during this time?

11 A Yes.

12 Q Did you say anything to him?

13 A No, not that I remember.

14 Q How long were you in the recreation yard for?

15 A What was the question?

16 Q How long were you in the recreation yard for?

17 A I don't remember.

18 Q Who else was with you aside from the officer?

19 A I don't remember.

20 Q Were there any other detainees with you?

21 A Yes.

22 Q How many?

23 A I don't remember.

24 Q More than one?

25 A I don't remember.

1 A Right.

2 Q Were there any officers with you in the room?

3 A No.

4 Q Were you handcuffed at that time?

5 A Yes.

6 Q When the nurse took your blood pressure, were your
7 handcuffs taken off?

8 A No.

9 Q So you mentioned that you went to a second room?

10 A Correct.

11 Q How far was that from the first room that you were
12 in?

13 A Actually, I don't remember.

14 Q The second room that you were in, was anyone in
15 there with you?

16 A Yes.

17 Q Who was with you?

18 A The same people who were with me in the previous
19 room.

20 Q Were there any officers with you?

21 A No.

22 Q How long were you in the second room for?

23 A In the other room, I don't remember because they
24 wet the other guys and they took us to the room.

25 Q When you say, "they wet the other guys," what do

1 you mean?

2 A They through some hot water. They took them to
3 the showers and soaked them in hot water.

4 Q How many other guys? You said, the other guys,
5 how many other guys were taken to the shower?

6 A I don't remember.

7 Q More than one?

8 A Yes.

9 Q More than two?

10 A Yes.

11 Q More than three?

12 A I don't remember.

13 Q How do you know they were taken to the showers?

14 A Because they told me.

15 Q Did you see them in showers?

16 A I saw them all soaked.

17 Q Did you see them in a shower?

18 A In the showers when I was just walking by. I was
19 walking by and I saw that they were crying. I moved away.

20 Q So when you went from the first room to the second
21 room, did you walk by the showers?

22 A Walk by the showers? No. It was a room that had
23 showers.

24 Q Did the second room have showers in it?

25 A No.

1 A When I took a shower myself?

2 Q So between the first room and the second room, at
3 some POINT, did you go in a shower?

4 A Between the first and the second room?

5 Q Yes. You were put in a shower?

6 A Yes, they took me to the shower.

7 Q After the first room?

8 A After the first room.

9 Q So from the first room, you walked to a shower; is
10 that correct?

11 A Correct.

12 Q How long were you in the shower?

13 A I just faked that I was putting water on me and I
14 left.

15 Q Why did you fake that?

16 A Because when I put some water on my face it burned
17 even more.

18 Q So you pretended like you were putting water on
19 yourself?

20 A I didn't say, I pretended. I started putting some
21 water on because it started burning, I stopped doing it.

22 Q Where was it burning?

23 A In my face and my shoulder and arm.

24 Q Which arm?

25 A My right arm.

1 Q What did you talk about?

2 A About the pain each one of us was experiencing.

3 Q What did you say about your pain?

4 A That it was also burning.

5 Q Did you say anything else?

6 A I don't remember.

7 Q Where was it burning?

8 A My arm, my right shoulder, and my face.

9 Q You mentioned the other detainees were talking
10 about their pains as well, correct?

11 A Correct.

12 Q Do you remember if Isaac said anything about his
13 pain?

14 A I mean, he didn't talk that much. He was crying
15 just as Mateo was.

16 Q Did he say any part of his body was hurting?

17 A Which person?

18 Q Isaac.

19 A Isaac, his face.

20 Q Did he say anything else was hurting?

21 A Back of the arm. But I don't remember which arm.

22 Q Which table was Mateo sitting at, the first or the
23 second? You were at the first?

24 A Yes. I don't remember.

25 Q Was he sitting at your table?

1 Q. How frequently do you have knee injury -- or
2 like issues with your knee?

3 A. More than anything in the morning, when it's
4 very cold, and when I go to the store, it hurts.

5 Q. Are you claiming any emotional injuries in this
6 case?

7 A. Yes, because what I lived there, I will never
8 forget. I will never forget seeing the faces of my
9 friends, seeing them crying, and that they put pepper
10 spray on me. I had never lived that, not even in my
11 country. All of that, I don't know how I feel whenever
12 I think back of that moment.

13 To remember that, every time I think about it,
14 I remember that they would cry and -- and you felt
15 helpless because we couldn't really do anything, anyone
16 there, and I believe it was a very difficult time in my
17 life.

18 Q. You said that pepper spray is something that
19 you didn't even see in your own country.

20 Are you claiming that this incident was more
21 traumatizing than what you saw in El Salvador?

22 MS. SWEETSER: Objection, argumentative and
23 vague.

24 BY MS. STROTTMAN:

25 Q. You can answer.

1 A Lately, yes.

2 Q I know you said earlier where it was located, but
3 what city is the clinic in?

4 A I don't remember. Maybe Carson. I don't
5 remember.

6 Q Is it the same city where you live?

7 A No.

8 Q What city do you live in?

9 A In Long Beach.

10 Q Me too. We're neighbors. Do you drive currently?

11 A No.

12 Q Are you on any special diets recommended by your
13 doctor?

14 A Diet, yes. They gave me a diet but I don't follow
15 it.

16 Q Me either. What are the perimeters of the diet?

17 A The nutritionist told me to try to eat healthy and
18 less fat because the doctor recommended that.

19 Q So the purpose of the diet is weight loss; is that
20 correct?

21 A Correct. That's what I believe.

22 Q Do you have any sort of medical training?

23 A I don't understand.

24 Q Are you a doctor?

25 A No.

1 detainees that went to go talk to the officer tell the
2 officer that you were on a hunger strike?

3 A No.

4 Q Okay. While you were in segregation, did anyone
5 come and interview you, related to the incident?

6 MS. ALARCON: Objection as to when he was in
7 segregation. Vague as to when he was in segregation.

8 THE WITNESS: Can you repeat the question.

9 BY MS. AGUADO:

10 Q While you were in segregation, did anyone
11 interview you related to the incident?

12 A I don't remember.

13 Q A day after the incident, June 13, do you remember
14 talking to anyone about the incident?

15 A I don't remember.

16 Q So you don't remember telling anyone a summary of
17 the events?

18 A I don't remember.

19 Q At some point, was there a hearing related to the
20 incident?

21 A Not as far as I know.

22 Q Was there ever a time that you had to discuss the
23 incident with people?

24 A Which kind of people?

25 Q You tell me.

1 agents wouldn't pay attention to anything that you told
2 them regarding the care that you were receiving while you
3 were at the facility?

4 A Because they didn't pay attention to us.

5 Q Can you provide me with an example where they
6 wouldn't pay attention to you, before June 12?

7 A Which officer?

8 Q ICE agents.

9 A I don't remember.

10 Q Do you have a recollection of expressing your
11 concerns or complaints about the medical care at Adelanto
12 Detention Facility to anybody that worked at Adelanto
13 Detention Facility?

14 A Before or after?

15 Q At any time.

16 A On the kites.

17 Q Did you write down your complaints about medical
18 care on the kites and send that to the medical department?

19 A On the kite and on the medical paper.

20 Q So on the kite and the medical paper, are those
21 two separate things?

22 A They are different ones. Sometimes, they didn't
23 have the medical forms so they said that it was all right
24 to send it through the kite.

25 Q I'm going to move on. So right now, I'm talking

1 Q Do you know her name?
2 A I forgot it.
3 Q And you told her that you knew your actions were
4 wrong?
5 A Correct.
6 Q Did you tell anybody else that?
7 A I don't remember.
8 Q Do you know who Omar Martinez is?
9 A Yes.
10 Q Do you talk to him regularly?
11 A No.
12 Q Have you seen him since you left the facility?
13 A No.
14 Q Did you only talk to him while you were at the
15 facility?
16 A I only heard an audio.
17 Q You heard an audio of him?
18 A Yes.
19 Q When did you hear an audio of him?
20 A Approximately two weeks ago.
21 Q Were you with your attorneys when you heard the
22 audio?
23 A No.
24 Q Was it a voice mail message?
25 A It was a personal message.

EXHIBIT 29

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA MARTINEZ; Case No:
ISAAC ANTONIO LOPEZ CASTILLO; 5:18-cv-01125-R-GJS
JOSUE VLADIMIR CORTEZ DIAZ; Hon. Manuel L. Real
JOSUE MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE RODRIGUEZ;
ALEXANDER ANTONIO BURGOS MEJIA;
LUIS PENA GARCIA;
JULIO CESAR BARAHONA CORNEJO,
as individuals,

Plaintiffs,

vs.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF ADELANTO,
a municipal entity; GEO LIEUTENANT
DURAN, sued in her individual
capacity; GEO LIEUTENANT DIAZ, sued
in her individual capacity; GEO SERGEANT
CAMPOS, sued in his individual capacity;
SARAH JONES, sued in her individual
Capacity; THE UNITED STATES OF AMERICA
and DOES 1-10, individuals,

DEPONENT:

LUIS PENA GARCIA

Defendants.

Taken: June 4, 2019

1 A Yes.

2 Q And does this indicate that you received a detainee
3 book in Spanish?

4 A It says that I saw a video. You said a manual. A
5 manual is -- a handbook is in paper.

6 Q Okay. Doesn't this document talk both about a manual
7 and a video?

8 A Could you repeat it? I don't understand.

9 Q Does this document reference both the video and the
10 manual?

11 A No. The video didn't have the rules. Just about some
12 rights, like the right to an attorney and things like
13 that.

14 Q Do you see the line where you first have your initials?

15 A Yes.

16 Q Could you tell me what that line says?

17 A No.

18 Q Could you read that to me, that line where your
19 initials are?

20 A One says: I verify that I received the manual/handbook
21 of ICE and GEO, but the manual was in English.

22 Q Did you ever request the manual in Spanish?

23 A No. I had no idea what a handbook/manual was.

24 Q But you received the manual in English; is that
25 correct?

1 Q But did you ever give this to anyone else?

2 A Not that I remember.

3 Q So going back to what happened after breakfast, after

4 the first officer pepper sprayed you --

5 A Yes.

6 Q -- what happened after that?

7 A As I said, more officers arrived, and they start

8 submitting us -- subjugating us.

9 Q Sorry, what did you say happened?

10 A They started subjugating, pulling us, pushing us for us

11 to get up from the table. Another officer arrived in

12 white that -- they were the superiors, and he arrived

13 with another pepper gas tank, and he started spraying

14 us as well.

15 Q Were you personally pepper sprayed by the second

16 officer?

17 A I don't remember. I really don't remember who sprayed

18 me.

19 Q Do you claim you were injured by any of the officers

20 who were pulling you from the table?

21 A Yes, but I cannot say it was this officer, because I

22 was blinded by the pepper spray. At that moment I

23 couldn't distinguish who was -- I just felt the pulls,

24 the pushes, and the blows.

25 Q While this was going on, could you see the other

1 Q How so?

2 A I had marks in my body when they grabbed me, and when
3 they pushed me against the wall, I banged my head. And
4 even when I was being taken outside, knowing that I
5 couldn't see, in the hallway, they, once again, pushed
6 me against the wall.

7 Q What areas did you have marks on your body?

8 A The head. The face was red due to the spray. I had
9 scratches right here in the neck. I had red here due
10 to the blows in the ribs.

11 Q Anything else?

12 A That I remember, no.

13 Q Were you escorted out of the dorm by an officer?

14 MS. FLYNN: Objection, vague.

15 THE WITNESS: I wasn't escorted. I was
16 pushed.

17 BY MS. STROTTMAN:

18 Q Were you pushed out of the dorm by an officer?

19 A Yes.

20 Q Where did they take you outside?

21 A To the patio or yard.

22 THE INTERPRETER: The interpreter would like
23 to say patio, slash, yard.

24 BY MS. STROTTMAN:

25 Q How long were you out in the yard area?

1 A Very briefly. They were able to get the group of us
2 out of there. We were handcuffed and on the floor, and
3 they opened another door and got the detainees out,
4 because the smell of the pepper spray was very strong.
5 And after that, we were separated from the group --
6 from the other detainees, and we were placed in a
7 smaller room. A medic arrived there just to take our
8 blood pressure --

9 THE INTERPRETER: No, correction. The
10 interpreter wants to correct that. Pulse.

11 A Then they took us to a smaller room that had showers,
12 and they made some of the members of the group take
13 showers with hot water.

14 BY MS. STROTTMAN:

15 Q Did you take a shower?

16 A No, no. I heard the scream from the others from the
17 burn, and they said that we shouldn't take showers, the
18 rest of us. They started pushing us all, because they
19 wanted us to take -- that we take the shower with the
20 water, but we refused and started moving backwards.

21 After that, they took us to a room that was a
22 little bit bigger, and we were there for a good -- for
23 a long time handcuffed, and they started taking us
24 little by little, and they started changing our
25 uniform. They gave us an orange uniform, and they said

1 BY MS. STROTTMAN:

2 Q What did you tell GEO during your disciplinary hearing?

3 A It wasn't a hearing. It was an officer, and he arrived
4 to make -- to ask me questions. That's it.

5 Q And what questions did he ask you?

6 A I don't remember exactly.

7 Q Do you remember what you told this officer?

8 A I don't remember.

9 Q Do you recall telling the officer that your actions
10 were wrong?

11 A What do you mean by wrong?

12 Q That you understood that you were breaking rules, but
13 you were just trying to talk to someone?

14 MS. FLYNN: Objection, argumentative. Vague.

15 THE WITNESS: We weren't following anybody,
16 because nobody was giving us an order. We talked among
17 us, and we only wanted to talk. After the aggression,
18 we didn't know what was correct to say, because we were
19 nervous, and if we -- if we were punished because we
20 expressed ourselves, what will happen if we did it
21 again?

22 BY MS. STROTTMAN:

23 Q You received discipline?

24 MS. FLYNN: Wait. I didn't understand that.

25

1 BY MS. STROTTMAN:

2 Q You received discipline from this incident; is that
3 correct?

4 MS. FLYNN: Objection, vague.

5 THE WITNESS: Does discipline mean going to
6 segregation?

7 BY MS. STROTTMAN:

8 Q Well, you went to segregation; is that correct?

9 A Yes.

10 Q And they took away your commissary; is that correct?

11 A Yes, commissary.

12 Q How long were you restricted from commissary?

13 A Still they took us to the tanks. The entire time we
14 were in segregation.

15 Q How long was that?

16 A Ten days.

17 Q So you also had no contact visits for ten days; is that
18 correct?

19 A Yes.

20 Q Did you receive any other form of punishment?

21 MS. FLYNN: Objection, vague.

22 THE WITNESS: Form of punishment like what?

23 BY MS. STROTTMAN:

24 Q That's what I'm asking you.

25 A Like what kind of punishment? They took the commissary

1 the days I spent there. The yard they took me to was a
2 cage, not a yard. To talk to the attorneys -- they
3 blocked the numbers for the attorneys. We didn't have
4 any freedoms -- the same freedoms to call. We -- they
5 will only lend you a phone for a shorter time.

6 Q Let's talk about your phone calls. Can you describe
7 the problems that you had with the phone calls after
8 this?

9 A I tried to call my attorney, and the call would not go
10 through.

11 Q What was the name of your attorney?

12 MS. FLYNN: Objection, vague.

13 THE WITNESS: That's with respect to my other
14 case.

15 BY MS. STROTTMAN:

16 Q I'm just trying to figure out the number that you claim
17 was blocked. Can you identify your attorney's name?

18 A They blocked several numbers, but the one that I called
19 most frequently was my attorney, Mark.

20 Q So they blocked -- you claim they blocked your
21 attorney's phone number?

22 A Yes, the numbers.

23 Q Who else's phone numbers did they block?

24 A Family.

25 Q Can you be specific which family members?

1 A No.

2 Q Anyone else other than your attorney and family?

3 A No. Those were the only numbers I called.

4 Q In one of your documents -- I can't remember if it was

5 the Complaint, but it said that you had issues calling

6 Alex Messing.

7 A That's another number they blocked.

8 Q Who is this person?

9 A Another attorney.

10 Q Who is Ramon?

11 A Another of the attorneys that were supporting us in the

12 asylum cases.

13 Q Was this the first time you had problems contacting

14 your attorney?

15 A Yes.

16 Q How do you know these phone calls were blocked?

17 A Because I made the phone call and it wouldn't go

18 through.

19 Q So which phones were you calling from?

20 A The one that the GEO company has.

21 Q Was it in the segregation unit?

22 A Yes. Also, when we were sent to the tanks, those were

23 blocked.

24 MS. FLYNN: When you're done with this

25 section on phones, do you want to take a lunch break?

1 Q Where were the phones that you would normally call your
2 attorneys?

3 MS. FLYNN: Objection, vague.

4 THE WITNESS: In the tanks. In the
5 dormitory.

6 BY MS. STROTTMAN:

7 Q When you refer to the tank, what does that mean?

8 A That's what they referred -- what they called the
9 dormitories.

10 Q So after June 12, you claim that your phone calls were
11 blocked to your attorneys; is that correct?

12 A Yes.

13 Q Were you calling from the same phones that you used
14 before June 12?

15 A It's the same phone line. Different dorms, but same
16 line -- telephone line.

17 Q What's the call-out procedure to make a phone call at
18 Adelanto?

19 A First, you have to punch in the number you have in the
20 card or with the commissary number, then dial a pin,
21 and then you dial the phone number.

22 Q Do you know if it's the same procedure when you're in
23 administrative segregation?

24 A Yes.

25 Q Were you able to call anyone in administrative

1 segregation?

2 A No, not that I remember.

3 Q After you were in administrative segregation for ten
4 days, you went back to your dorm; is that correct?

5 A I was returned to another dorm.

6 Q After you were returned to the other dorm, were you
7 able to make any phone calls?

8 A Yes, but not to my attorneys.

9 Q So who were you able to speak to?

10 A When they arrive for visits, they gave me a different
11 number.

12 Q Who came to visit?

13 A Mark.

14 Q Is Mark your attorney?

15 A Yes.

16 Q So when he came to visit, they gave you another number
17 to call him?

18 A Yes, another phone number.

19 Q And you were able to reach him; is that correct?

20 A Yes, but it was a new number, not the number they had
21 blocked.

22 Q So Mark gave you a new phone number to call; is that
23 correct?

24 A Yes.

25 Q Were you able to call anyone other than Mark's new

1 phone number?

2 A Yes.

3 Q Who else were you able to call?

4 A Some of my family members.

5 Q Did you have problems with blocked phone calls?

6 MS. FLYNN: Objection, vague. Asked and
7 answered.

8 THE WITNESS: Yes.

9 BY MS. STROTTMAN:

10 Q My question was how long did the problems with your
11 blocked phone numbers last?

12 A The numbers that were blocked were never unblocked.

13 Q Did you complain to anyone about having issues calling
14 your attorneys?

15 A I don't remember, but what I remember were some kites.

16 Q What was the last part? You remember --

17 A I just remember we sent a kite.

18 Q What did your kite say?

19 A That I couldn't call those numbers.

20 MS. FLYNN: Just for the record, there is a
21 lot that -- you're cutting out, and we're reading your
22 lips.

23 MS. STROTTMAN: I'll speak louder and see if
24 that helps at all.

25 MS. FLYNN: Yes, let's try that.

1 Q For example, do you have problems sleeping?

2 A Yes.

3 Q How frequently do you have problems sleeping because of
4 this incident?

5 A Many, because I stay thinking about what happened.

6 Q Have you ever taken any medications for your emotional
7 distress?

8 A As I said, I cannot self-medicate.

9 Q I'm not going to go into the details about when you
10 were living in El Salvador, but do you have emotional
11 distress from violence in El Salvador?

12 A No. It's just that that is very different. One is the
13 fear to be detained again, and another is the fear to
14 lose your life.

15 Q So the fear of losing your life, what is that from?

16 A From El Salvador. But I came to this country trying
17 not to be in fear and looking for freedom, and the
18 first thing they do is to arrest me, and then they
19 abuse the rights that I think I have here. Like, the
20 freedom of expression.

21 Q Do you believe the freedom of expression means that you
22 did not have to follow the rules at Adelanto?

23 MS. FLYNN: Objection, vague. Argumentative.

24 THE WITNESS: I am aware that you have to
25 follow the rules, but if you don't know the rules, how

1 A No, I treat them -- all of them the same.

2 Q You don't recall whose idea it was to go on a hunger
3 strike on June 12?

4 MS. FLYNN: Objection, asked and answered.

5 THE WITNESS: No.

6 BY MS. STROTTMAN:

7 Q Did anyone -- before June 12, did anyone express fears
8 that a hunger strike could lead to punishment?

9 MS. FLYNN: Objection, vague.

10 THE WITNESS: No, nobody knew that we could
11 be punished for expressing ourselves.

12 MS. STROTTMAN: I think I'm almost done with
13 my questions. Judy, do you have any questions?

14 MS. TISHKOFF: Yes, I have a few. Do you
15 want me to go ahead or --

16 MS. STROTTMAN: Sure.

17 E X A M I N A T I O N

18 BY MS. TISHKOFF:

19 Q Mr. Garcia, my name is Judy Tishkoff, and I represent
20 Sarah Jones in this case. Do you know who Sarah Jones
21 is?

22 A No.

23 Q Do you remember -- strike that.

24 Do you remember a nurse taking your vital
25 signs shortly after the incident occurred?

EXHIBIT 30

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA MARTINEZ;)
ISAAC ANTONIO LOPEZ CASTILLO;)
JOSUE VLADIMIR CORTEZ DIAZ;)
JOSUE MATEO LEMUS CAMPOS;)
MARVIN JOSUE GRANDE)
RODRIGUEZ; ALEXANDER ANTONIO)
BURGOS MEJIA; LUIS PENA)
GARCIA; JULIO CESAR BARAHONA)
CORNEJO, as individuals)
)
Plaintiffs,)
)
vs.) CASE NO.
) 5:18-cv-01125-R-GJS
THE GEO GROUP, Inc., a)
Florida corporation; the)
CITY OF ADELANTO, a municipal)
entity; GEO LIEUTENANT DURAN,)
sued in her individual)
capacity; GEO LIEUTENANT)
DIAZ, sued in her individual)
capacity; GEO SERGEANT)
CAMPOS, sued in his)
individual capacity; SARAH)
JONES, sued in her individual)
capacity; THE UNITED STATES)
OF AMERICA, and DOES 1-10,)
individuals,)
)
Defendants.)
)

WEBCAM DEPOSITION OF MARVIN JOSUE GRANDE RODRIGUEZ

TAKEN ON

THURSDAY, MAY 30, 2019

KIMBERLY E. LEPINS, CSR NO. 9592, RPR

1 Q. Did they listen to your heart?

2 A. Yes.

3 Q. Or your lungs?

4 A. Yes.

5 Q. Did they weigh you?

6 A. Yes.

7 Q. And they gave you clothes?

8 A. Yes.

9 Q. Did they tell you about rules?

10 MS. FLYNN: Objection, vague.

11 THE WITNESS: No, it was in a book that they
12 provided the rules.

13 BY MS. COLEMAN:

14 Q. They gave you a book about rules?

15 A. Yes.

16 Q. In English or Spanish?

17 A. It was in English.

18 Q. Did they give it to you in Spanish also?

19 A. As I recall, they didn't have it in Spanish. I
20 was told that I was going to be given one in Spanish
21 afterwards but it never happened.

22 Q. Did you ever read anyone else's book in
23 Spanish?

24 A. No.

25 Q. I'm going to mark as Exhibit 1 the Detention

1 A. No.

2 Q. Did you take a tray with food?

3 A. Yes. And then we returned it but we did not
4 touch the food.

5 Q. Why did you take a tray?

6 A. Because we had all lined up. The officer would
7 come and wake us up. When he would see us laying there,
8 he would get us up and have us all stand up in line.

9 Q. But you could refuse to take the food, right?

10 A. Correct, we just took it and set it down on the
11 table.

12 Q. Why did you take the food?

13 A. I don't know.

14 Q. Had you decided to do a hunger strike before
15 the breakfast?

16 A. Correct.

17 Q. So you could have told him we're not eating,
18 right?

19 MS. FLYNN: Objection.

20 THE WITNESS: Correct, but we couldn't
21 communicate with the officer.

22 BY MS. COLEMAN:

23 Q. Isn't no the same in English and Spanish?

24 MS. FLYNN: Objection, argumentative.

25 THE WITNESS: Yes, I understand, but I decided

1 to take it but not eat it.

2 BY MS. COLEMAN:

3 Q. And everyone else did the same?

4 MS. FLYNN: Objection, vague.

5 THE WITNESS: I don't remember. I just
6 remember what I did.

7 BY MS. COLEMAN:

8 Q. Had you talked with the -- with the other
9 compatriots the night before about doing a hunger strike
10 with all of you?

11 A. Yes.

12 Q. And what was the plan?

13 A. To speak to -- to an officer and expose --
14 explain to him the things that we were -- our concerns,
15 one of the superior officers.

16 Q. Had you decided how many days you would do the
17 strike?

18 A. Three days.

19 Q. You decided that the night before?

20 A. Based on what we had seen and what was going
21 on, yes.

22 Q. When was this letter given to an official? And
23 I'm referring to Exhibit 4.

24 A. This was on the day of the incident, in the
25 morning.

1 THE WITNESS: I don't remember that too well.
2 They would just say it was time to pick up the plates.
3 I don't know how long it would take.

4 BY MS. COLEMAN:

5 Q. You don't know how long it would take for what?

6 A. For breakfast. Usually my calculation or
7 estimate was that it was 15 or 20 minutes after picking
8 up the plates.

9 Q. Okay.

10 And that morning, did you put your plate away?

11 A. No.

12 Q. You stayed at the table with your plate?

13 A. I returned it.

14 Q. The plate?

15 A. Yes, I just took it and I put it separately on
16 another table apart. I didn't have breakfast.

17 Q. I understand you didn't eat. What did you do
18 with the plate?

19 A. I returned it to the officer.

20 Q. And then you sat back down at the table?

21 A. Yes.

22 Q. And normally after that time that you returned
23 the plate, you had 15 or 20 minutes before count, right?

24 A. That was my estimate. I don't actually know
25 how much time it was but that's how much I would

1 Q. Aren't there eight plaintiffs? There's eight
2 people here, correct?

3 A. I suppose.

4 Q. Who is the other person that is not listed
5 there?

6 A. Those of us that were left. At the beginning
7 there were nine of us, but then one of them was deported
8 so that left eight of us there.

9 Q. That left eight of you in the lawsuit?

10 A. Yes. I never knew the name of the other -- of
11 the other participant.

12 Q. And the nine of you decided the night before
13 not to go back to your bed for count?

14 A. I don't remember too well. I think so.

15 Q. And you had decided to do a hunger strike for
16 three days?

17 A. Correct.

18 Q. Since you knew that when the officer yelled for
19 count, that was an order, did you know that there would
20 be consequences for not obeying the order?

21 MS. FLYNN: Objection, vague, compound, calls
22 for speculation.

23 THE WITNESS: Could you please repeat the
24 question.

1 BY MS. COLEMAN:

2 Q. Did you know that you would be in trouble for
3 not going back to your bed for count?

4 MS. FLYNN: Objection, vague, calls for
5 speculation.

6 THE WITNESS: I just had an idea; I didn't know
7 much. 

8 BY MS. COLEMAN:

9 Q. Did you tell the lady who came or any other --
10 or any officers that you were not going to return to
11 your bunk?

12 A. I never really spoke to the officers the whole
13 time. It was always the African who would translate,
14 the one who would speak Spanish to the officers.

15 Q. Was he going to participate in the strike, too,
16 or just translate?

17 A. No, just translate.

18 Q. Do you -- is it your -- do you believe that the
19 African man told any officer or the sergeant who came
20 that you guys would not be returning to your beds?

21 MS. FLYNN: Objection, calls for speculation.

22 THE WITNESS: Well, I think so.

23 BY MS. COLEMAN:

24 Q. Why -- why do you think so?

25 A. Well, because they just returned him to his bed

1 and they left us there in a day room.

2 Q. Did you hear anyone tell the officers or the
3 sergeant why you weren't going back to your bed?

4 A. According to what the African told them, is
5 because we were going to start a hunger strike and
6 because we wanted to speak to one of the superior agents
7 to present our complaints to that person.

8 Q. Did you hear any officers telling you to go to
9 your bed for count?

10 A. Yes.

11 Q. And you chose to ignore those commands, right?

12 MS. FLYNN: Objection, argumentative.

13 THE WITNESS: Yes, due to the reason that we
14 wanted to speak to a superior or a sergeant.

15 BY MS. COLEMAN:

16 Q. What happened next?

17 A. The officer used his radio. I imagine that
18 that's when he called the lady and a bunch of guards
19 appeared.

20 Q. Did the lady that you described as mad show up
21 before the other officers?

22 MS. FLYNN: Objection, vague.

23 THE WITNESS: They showed up almost at about
24 the same time.

1 A Uh-huh.

2 Q Okay.

3 A "Reyes, restraints, helping to pull detainees
4 apart."

5 Q Okay.

6 A And then they were in violation -- the
7 detainees were -- it just says "Violation 213, engaging
8 or inciting a group demonstration."

9 Q I believe it looks like "engaging in or
10 inciting a group demonstration."

11 A Uh-huh.

12 Q Okay. The box below it, where it says "Staff
13 Injuries," there's an X next to No. Did you place that
14 X?

15 MS. AGUADO: If you know.

16 THE WITNESS: I don't recall.

17 BY MS. STEINBACK:

18 Q Okay. And the box below that, it looks like
19 you highlighted everything. Could you also just read
20 literally what you wrote there into --

21 A Okay. Well --

22 Q -- the record.

23 A -- except for this part. I didn't write that.

24 Q Okay.

25 A It just says, "Detention Officer A. Reyes, OC

1 correct?

2 A. Correct. They set me on my feet; they pushed
3 me again, and that's when I hit against the wall. Then
4 they had me laying down.

5 Q. So your face hit the wall twice and then you
6 laid down?

7 A. Correct.

8 Q. Were you bleeding?

9 A. No.

10 Q. How did you get down to the ground?

11 A. The officers demanded that I lay down.

12 Q. And you were able to get down?

13 A. Yes, but they helped me. They pushed me and
14 then they set me -- they set me into a flat position on
15 the ground.

16 Q. Were you still handcuffed?

17 A. Correct.

18 Q. Did they give you any commands?

19 A. No. There were officers that remained there
20 watching us to make sure that none of us got up or
21 anything.

22 Q. I'm sorry, were you handcuffed or no?

23 A. Yes, I was handcuffed.

24 Q. Did they loosen the handcuffs?

25 A. No.

1 Q. For medical?

2 A. Yes, they came -- I don't know if it was for
3 medical, but they came and took our blood pressure and
4 to take note of the blows and the scratches that we had.

5 Q. Did you see medical staff?

6 A. Yes, a nurse that took our blood pressure and
7 our names.

8 Q. Do you know the name of the nurse?

9 A. No.

10 Q. Male or female?

11 A. Female.

12 Q. Did she do anything else with you?

13 A. I don't know if that's the same nurse that took
14 me to the showers but after that, we were taken to the
15 showers where we were bathed with hot water. When they
16 were bathing us, I fainted because of the -- the gas and
17 the heat of the water. It was far too much for me.

18 Q. Were you handcuffed while you were in the
19 shower?

20 A. I was handcuffed the whole time.

21 Q. So you couldn't adjust the water yourself?

22 A. No.

23 Q. Before you were brought to the shower, were you
24 medically examined?

25 MS. FLYNN: Objection, vague.

1 THE WITNESS: I don't remember if it was at the
2 beginning or if it was after the shower but I was --
3 what I remember is that I fainted in the shower because
4 the gas wouldn't let me breathe.

5 BY MS. COLEMAN:

6 Q. What happened after the shower?

7 A. After the shower, we were again taken to the
8 room where we were waiting to be transferred to
9 segregation, I think, or some other place. I don't
10 know.

11 Q. Were you seen by medical there?

12 MS. FLYNN: Objection, vague.

13 THE WITNESS: Before we were taken out of the
14 unit where everything happened, we were seen by medical.

15 BY MS. COLEMAN:

16 Q. Was that a nurse or doctor that saw you?

17 MS. FLYNN: Objection, calls for speculation.

18 THE WITNESS: I think it was the same woman who
19 took me to the shower.

20 BY MS. COLEMAN:

21 Q. And you thought she was a nurse before, right?

22 A. I suppose, yes.

23 Q. And what did she do after the shower?

24 A. She took my blood pressure again. They
25 re-examined the -- behind my ears. I was evaluated for

1 A No, ma'am.

2 Q So why is there a watch commander?

3 A That's just what they call us, the watch
4 commanders. They call all the lieutenants watch
5 commanders.

6 Q Okay. So it's interchangeable?

7 A Yes.

8 Q Okay. So when you said you spoke with a watch
9 commander on June 12th, was that the lieutenant who
10 replaced you for --

11 A Yes, ma'am.

12 Q -- second shift?

13 Thank you. You've got to let her finish.

14 MS. AGUADO: Can we take a short break?

15 MS. STEINBACK: Sure.

16 (Recess was taken from 1:25 p.m. to 2:05 p.m.)

17 MS. STEINBACK: Back on the record.

18 BY MS. STEINBACK:

19 Q Ms. Diaz, during the break, did you review any
20 documents?

21 A No.

22 Q Did you have any conversations other than those
23 with your attorney?

24 A No.

25 Q Before the break, we were talking about the

1 worse manner.

2 BY MS. COLEMAN:

3 Q. At 6:34:52, we see the woman with the pepper
4 spray walking away, right?

5 MS. FLYNN: Objection, vague.

6 THE WITNESS: I don't know. Maybe, could be;
7 could not. I don't know what her intentions were.

8 BY MS. COLEMAN:

9 Q. Okay. If we rewind to 6:34:01, she's standing
10 between the two tables, looks like, with a pepper spray
11 in her hand, right?

12 A. I'm not able to make out if that's spray or if
13 that's some other device.

14 Q. Is that the angry woman in white walking
15 around?

16 A. Correct.

17 Q. So now at 6:34:47 on the video, she's four
18 tables away from you with your back to your table,
19 right?

20 A. Correct.

21 Q. So at that time, couldn't you have gotten up
22 from your table and walked back to your bed?

23 MS. FLYNN: Objection, vague, calls for
24 speculation, lacks foundation, argumentative.

25 THE WITNESS: The truth is I couldn't tell you

1 for the same reason. I don't know if the officers might
2 act against me. I don't know how they could act or how
3 they would have acted in that moment, if they were to
4 consider that I was a danger were I to get up at that
5 moment or not.

6 Q. Were they giving you any orders?

7 A. I didn't hear any orders. They just let the
8 angry lady in white handle the problem.

9 Q. Did you understand that they just wanted you to
10 go back to your beds and wait for count?

11 MS. FLYNN: Objection, vague, compound, calls
12 for speculation.

13 THE WITNESS: I understand the question but
14 like I said, I don't know how they would have acted at
15 the moment were we to have gotten up.

16 BY MS. COLEMAN:

17 Q. Why do you think that they would have perceived
18 you as a threat?

19 A. Because it was a very tense moment and any of
20 them could have imagined that we may -- could have acted
21 in a manner that was something against them.

22 Q. Are you speculating?

23 A. No, I'm just --

24 Q. But you don't know?

25 A. I'm just imagining what could have happened at

1 that moment.

2 Q. You don't know what was in their minds, right?

3 MS. FLYNN: Objection, argumentative.

4 THE WITNESS: Correct. I couldn't read their
5 minds but, however, it was a very tense environment.
6 One as well as the other could both expect the worse;
7 however we remained passive the whole time.

8 BY MS. COLEMAN:

9 Q. But you locked arms, right?

10 MS. FLYNN: Objection, argumentative.

11 THE WITNESS: Yes, when they started using
12 force.

13 BY MS. COLEMAN:

14 Q. Didn't you lock arms before they tried to pull
15 you out from the table?

16 A. I don't recall.

17 Q. You knew it was time for count, right?

18 MS. FLYNN: Objection, argumentative.

19 THE WITNESS: Yes.

20 BY MS. COLEMAN:

21 Q. When these officers were walking around, were
22 they giving any orders?

23 A. I don't know. The truth is, I don't know.

24 They were speaking to each other amongst themselves.

25 Q. At 6:37:06, it looks like there's a few of them

1 at your table, right?

2 A. Correct.

3 Q. Were they saying anything to you?

4 A. I don't know what they were saying.

5 Q. At the end of the table between the first and
6 second table, was that a supervisor at 6:37:19?

7 MS. FLYNN: Objection, calls for speculation.

8 THE WITNESS: I don't know. It looks like an
9 officer.

10 BY MS. COLEMAN:

11 Q. He was trying to talk to you guys; do you
12 remember that?

13 MS. FLYNN: Objection, calls for speculation.

14 THE WITNESS: Regarding that, they were
15 speaking to us in English the whole time. I was never
16 able to understand what they were saying. Since I speak
17 very little English, I was never able to understand them
18 and they speak very quickly.

19 BY MS. COLEMAN:

20 Q. You didn't hear any words like count?

21 A. Not at that moment.

22 Q. At 6:38:12 here on the video, it looks like the
23 officers are kind of around your table?

24 MS. FLYNN: Objection, vague.

25 THE WITNESS: From --

1 Q. Do you know who that person is who is being
2 restrained by two officers and then looks like the
3 sergeant in the white blouse that is right next to them?

4 A. No.

5 Q. And we're -- just for the record, we're at
6 6:39:07.

7 A. The truth is, I don't know who they might be.
8 What's more, I don't know what happened at what times on
9 the video since I didn't have a watch to check what was
10 happening.

11 Q. At 6:39:33, are you still in the room?

12 A. No. By that time, according to the video, they
13 had already taken me away.

14 Q. Do you recognize any of the people standing on
15 the second tier?

16 A. No. Most of them are from an African origin.
17 I don't know them. I -- I wasn't there for too long.

18 Q. Then on the floor we see the woman with the
19 white blouse standing, right?

20 A. Correct.

21 Q. Do you know the other people standing, are they
22 officers?

23 A. I don't know the name of any of the officers
24 nor the faces. Aside from that, you can't manage to
25 make it out. I don't know.

1 Q Were you in pain during that time?

2 A The tingling, yes. Pain, yes.

3 Q Did you -- on that day, did you have any cuts
4 on your face?

5 A No.

6 Q Did you experience any coughing as a result of
7 the OC spray?

8 A Just -- I would say a little bit. It wasn't a
9 lot for me. So it wasn't that bad for me when I got
10 sprayed.

11 Q Were there other people that it was worse for
12 who were in your group?

13 MS. AGUADO: Calls for speculation.

14 THE WITNESS: I don't know that because once I
15 got sprayed, I was done. So everybody else that was in
16 that group, I don't know how they reacted to the spray.

17 BY MS. STEINBACK:

18 Q And when you said that they flushed your eyes
19 with water, was it cold water? Hot water?

20 A Cold water.

21 Q Did they do anything else to decontaminate your
22 face?

23 A No. Just cold water, and then we sat in front
24 of fans until the stinging sensation went away.

25 Q Did sitting in front of a fan help relieve the

1 pain?

2 A Temporary.

3 Q How long did the pain last for you?

4 A Well, for me, as long as I didn't put my face
5 back in water again, I was okay. When I got home that
6 night and got up and took a shower again, it activated
7 the spray again. The stinging of the spray in my eyes.

8 Q When you took the shower, was it hot water or
9 cold water?

10 A Cold water.

11 Q So even cold water activated --

12 A Yes, ma'am.

13 Q How long did that go on for?

14 A I'm going to say probably -- just probably till
15 the end of that next day.

16 Q Did you do anything else -- and by that, I
17 mean, use creams, any other manner of decontamination
18 between the time that you were sprayed and when the pain
19 went away?

20 A No, ma'am.

21 Q Other than what you've described, did you
22 receive any other training on how to use OC spray at
23 Adelanto?

24 A No, ma'am.

25 Q Did you -- other than going through

1 everything got cleared up.

2 Q. What were they trying to clear up?

3 MS. FLYNN: Objection, vague, calls for
4 speculation.

5 BY MS. COLEMAN:

6 Q. If you know.

7 A. I don't have knowledge as to what they were
8 investigating but the officer in charge, I remember her
9 words clearly. When she told me that it hadn't been
10 our -- she was accepting her fault in the matter but
11 also saying that we had also been wrong.

12 Q. And who was that?

13 A. She introduced herself as Officer Duran. And
14 her words were clear. She mentioned, I know that we did
15 not act in a correct manner but you did not comply with
16 an order. That's why we're expecting you to be in here
17 between one to two weeks. Those were her words.

18 Q. In Spanish?

19 A. Correct.

20 Q. I handed you earlier Exhibit 3. Can you turn
21 to page 2801.

22 A. (Witness complies.)

23 Correct.

24 Q. Is that your signature?

25 A. Yes.

1 wanted to sign anything, then my signature wouldn't be
2 on here.

3 MS. FLYNN: By here, he's referring to the
4 previous page, 2801.

5 THE WITNESS: Correct.

6 BY MS. COLEMAN:

7 Q. And you signed page 2801?

8 A. Correct, I don't recall the other one.

9 Q. Did you have a hearing?

10 MS. FLYNN: Objection, vague.

11 THE WITNESS: Hearing for what? I don't
12 understand that question.

13 BY MS. COLEMAN:

14 Q. Did you have a hearing to determine if you had
15 engaged in or incited a group demonstration?

16 A. I don't remember that hearing.

17 Q. While you were in segregation, you were still
18 being -- you were still able to take showers every day,
19 right?

20 A. Correct, but due to the chemicals in the gas, I
21 was not able to take the shower. I wasn't able to
22 breathe. I couldn't take my shower.

23 Q. For how many days?

24 A. I don't recall, but over two weeks went by. I
25 would shower but not in the affected areas.

1 Q. What were the affected areas?

2 A. From my belly button to my head.

3 Q. How was your -- how was your torso affected by
4 pepper spray?

5 MS. FLYNN: Objection, vague.

6 THE WITNESS: As I said at the beginning, when
7 they first took me to shower, that's when the spray came
8 down to the lower parts of -- to the other parts of my
9 body.

10 MS. FLYNN: I don't know if you know that they
11 were in their jail clothes which had the pepper spray on
12 them. They were washed in their clothes when they took
13 their showers.

14 THE WITNESS: We did have our uniforms on. In
15 fact, when they transferred us to the segregation unit,
16 but the white shirt that we had on all the time was
17 soaked with the pepper spray, and so that's what caused
18 it to go all the way inside.

19 My neck area, my ears, my arms, they turned
20 white and swollen due to the chemicals.

21 We requested medical assistance, some kind of
22 cream, some kind of painkiller.

23 MS. FLYNN: I want to clarify the
24 interpretation. Can you ask him again what color his
25 skin turned.

1 from your viewpoint.

2 A. Correct. I mentioned this previously, before
3 watching the video. I did mention that I received
4 pepper spray. I didn't mention how many times. But I
5 do know at that moment what was mainly affected was my
6 arms, my face, and my head.

7 Due to the fact that I was under the effects of
8 gas, I was not able to notice that my shirt was full of
9 the gas.

10 Q. When you got -- was there anywhere else you
11 were sprayed?

12 A. No.

13 Q. Okay. So then you were brought to the shower.
14 Were your clothes taken off?

15 A. No. I was handcuffed with the same uniform,
16 black and blue color uniform.

17 Q. And what happened when you were put in the
18 shower?

19 A. With the water, the smell of the gas
20 intensified and that caused me to faint. I forgot to
21 mention in that part that the shower area was very
22 small.

23 At the moment I fainted, I remember that I hit
24 my head against the wall. And I'm able to remember that
25 I felt the hands of the nurse or the officer that took

1 me there that held me and tried to get me up when I
2 fainted.

3 Q. How do you know you hit your head on the wall
4 when you fainted?

5 A. After that, I felt the sudden pain and kind of
6 like a small bump to the back of my head.

7 Q. Was it bleeding?

8 A. No.

9 Q. When were you able to get out of those clothes?

10 A. After I was taken out of the shower, we were
11 transferred from the room from which we were going to be
12 taken to another zone.

13 After that, I remember that we were asked to
14 change clothes, change our clothes. We were given some
15 orange-colored clothing.

16 I also remember that they wanted us to change
17 our clothes with our handcuffs on. After that, another
18 officer wearing a white shirt came in and he was able
19 to -- to check our handcuffs, and he was able to notice
20 the marks on our wrists, which were very red. And he's
21 the one that made our handcuffs more comfortable before
22 transferring us to the next place.

23 And he removed our handcuffs so that we could
24 change and then he put them back on.

25 Q. So that's when you were able to change?

1 that deposition about my job.

2 Q Okay. So you read it after the incident and
3 then again while you were on paid leave?

4 A Yes, ma'am.

5 Q Okay. And when you read those policies, did
6 you, in fact, see that you had violated a written
7 policy?

8 A No.

9 Q Did you consider contesting your firing?

10 MS. AGUADO: I'm not really sure how that's
11 relevant.

12 But you can answer yes or no or if you haven't
13 decided yet.

14 THE WITNESS: Unknown at this time.

15 BY MS. STEINBACK:

16 Q Okay. Did you have any responsibility for the
17 handling of detainee grievances in your capacity as
18 lieutenant?

19 A No.

20 Q Did you ever have occasion to see detainee
21 grievances while you worked at Adelanto?

22 A A few.

23 Q Under what circumstances did you see those
24 grievances?

25 A When the grievance coordinator would come in

1 and explain to me that one of the officers had done
2 something, and then they just brought it in, pretty much
3 let me know what the grievance was, and then -- then the
4 grievance coordinator would talk to that detainee, and
5 then they would try to get it dropped. Because some of
6 the grievances were frivolous grievances from the
7 detainee.

8 Q So the grievance coordinator, to your
9 knowledge, would go to the detainee to see if they would
10 drop the grievance?

11 A Yes, ma'am.

12 Q In June of 2017, who was the grievance
13 coordinator, if you remember?

14 A Ms. Woelke. I don't remember her first name,
15 but it's Ms. Woelke. I think it's W-o-e-l-k-e,
16 Ms. Woelke.

17 Q While you were working at Adelanto up to and
18 including the time of the incident, did you ever hear
19 any detainee complaints about the food at Adelanto?

20 A Yes.

21 Q What complaints did you hear?

22 A The food wasn't good. That's pretty much what
23 they said, the food wasn't good. From reading this
24 report, our staff used to eat the food there too.

25 Q So your staff ate the same food as the --

1 Q In -- on June 12th of 2017, to your knowledge,
2 were there zip ties in central control?

3 A Not to my knowledge. I think the only time we
4 had zip ties were -- they were in our medical bags when
5 we would transport detainees out to the hospitals. But
6 they weren't inside -- like I said, the detainees didn't
7 have -- they didn't have access to that area at all, to
8 even go up that far into the institution.

9 Q Where is central command with respect to the
10 day room that was --

11 A At the front of the institution.

12 Q How far is that?

13 A It's -- let's see. You come in -- central
14 controls were in the very front, in the very front. So
15 they are nowhere near the housing units. They're up in
16 the very front when you first walk in.

17 Q How long would it take to walk from central
18 control to the -- to the East housing units?

19 A Walking, probably about 10, 15 minutes.
20 Running, probably a lot faster. Yeah, about -- probably
21 five minutes, if they're running, to get to the central
22 control for any equipment.

23 Q In watching the video, it looks like there are
24 windows on sort of what looks like maybe a second floor
25 overlooking a day room. Do you know what I'm talking

REPORTER'S COPY CERTIFICATE

I, KIMBERLY E. LEPINS, Certified Shorthand
Reporter for the State of California, hereby certify:

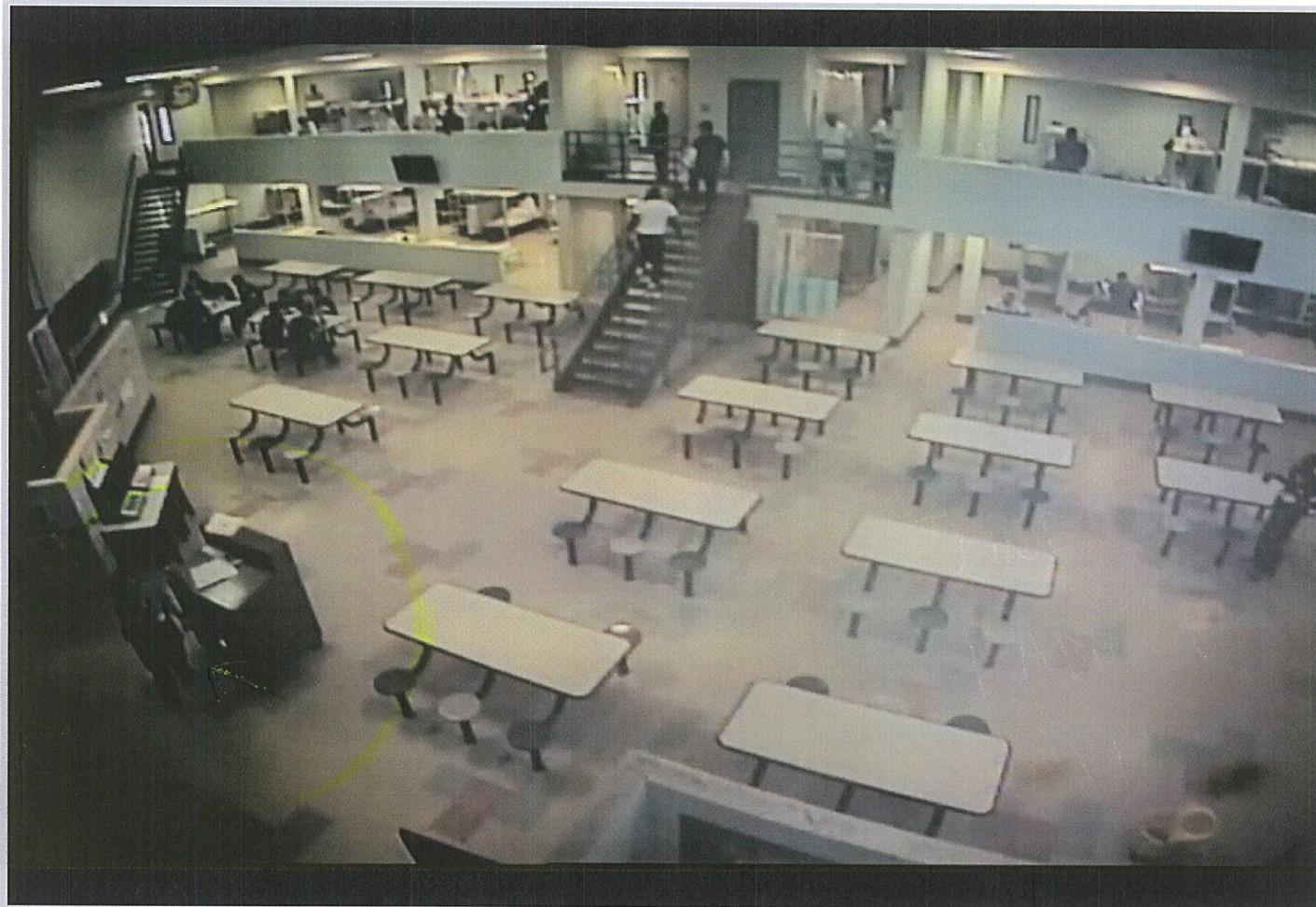
THAT the foregoing is a true and correct copy of the original record of the testimony given by the witness and of all objections made at the time of the examination, to the best of my ability.

10 I FURTHER CERTIFY that I am in no way
11 interested in the outcome of said action.

12 IN WITNESS WHEREOF, I have hereunto subscribed
13 my hand this 2nd day of June, 2019.


KIMBERLY E. LEPINS
Certified Shorthand Reporter
Certificate No. 9592

EXHIBIT 31



Device name : DVR-670-16A000 Date and time : 6/12/2017 6:30:51 AM (GMT -07:00)
MAC address : 00:00:00:00:00:00 Events : None
Camera name : East-2-C-1 Image size : 704 (h) x 480 (v)

EXHIBIT 2

WIT: Rebecca Jindi
DATE: 6/14/2019

EXHIBIT 32

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PENA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF LUIS PEÑA GARCIA's
RESPONSES TO DEFENDANT
THE GEO GROUP, INC.'S
INTERROGATORIES, SET ONE**

Plaintiffs,

V.

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals.

Defendants.

1 responses at a later date. Subject to those objections, Plaintiff responds as follows:

2 Plaintiff's physical injuries have healed, although his trauma and emotional
3 distress persist.

4

5 **INTERROGATORY NO. 10:**

6 If you contend that you will require any future health care treatment as a
7 result of the incident that is the subject of this litigation, please identify all medical
8 providers and/or witnesses who support your contention.

9 **RESPONSE TO INTERROGATORY NO. 10:**

10 Plaintiff incorporates his general objections. Plaintiff further objects that this
11 interrogatory calls for expert disclosures and conclusions prior to the time for
12 expert disclosures. Subject to those objections, Plaintiff responds as follows:

13 Plaintiff has not seen medical providers since leaving the detention center.
14 Plaintiff reserves the right to supplement this response at a later date.

15

16 **INTERROGATORY NO. 11:**

17 If you contend that you sustained emotional injuries as a result of the incident
18 that is the subject of this litigation, please describe the nature of the emotional
19 distress or psychological injury, the date and time when it was first experienced,
20 and the name and address of every psychiatrist, counselor, therapist, psychologist,
21 or social worker from whom he sought or obtained assistance.

22 **RESPONSE TO INTERROGATORY NO. 11:**

23 Plaintiff incorporates his general objections. Plaintiff further objects to this
24 interrogatory to the extent it calls for information that will be the subject of expert
25 disclosures. Plaintiff further objects that he is claiming only garden variety
26 emotional distress and thus the information sought in this interrogatory is not
27 proportional to the needs of the case. Subject to those objections, Plaintiff responds
28 as follows: Plaintiff felt angry and distressed at the treatment of the detainees. He

1 had expected the United States to be a land of freedom and was shocked and
 2 appalled at the brutal treatment. In segregation he felt stressed and alone and was
 3 not allowed to communicate with anyone or access the phone. He still thinks of it
 4 frequently and it brings back his feelings of distress. Plaintiff has nightmares and
 5 often has problems sleeping. He gets feelings of his heart racing or pounding
 6 sometimes, and he is afraid of being detained again. Plaintiff has not seen a mental
 7 health professional regarding this incident. He asked for one in the facility but was
 8 not provided access to a psychologist.

9

10 **INTERROGATORY NO. 12:**

11 Please identify, by name, address, and reason for treatment, all health care
 12 providers who have provided you with treatment of any kind since the incident that
 13 is the subject of this litigation.

14 **RESPONSE TO INTERROGATORY NO. 12:**

15 Plaintiff incorporates his general objections. Plaintiff further objects to this
 16 interrogatory on the ground of relevance, as overly broad and unduly burdensome,
 17 and to the extent it interrogatory calls for private and confidential medical
 18 information. Plaintiff objects to providing records of medical treatment unrelated
 19 to the injuries suffered in the incident. Plaintiff further objects that the records of
 20 his medical treatment in the facility are more readily available to Defendant than to
 21 Plaintiff. Subject to those objections, Plaintiff responds as follows:

22 Plaintiff has not seen any medical professionals regarding this incident since
 23 he was released from the facility.

24

25 **INTERROGATORY NO. 13:**

26 Please identify, by health care provider, date of service, amount of charges,
 27 amounts paid, and amount all special damages for health care treatment that you
 28 contend are attributable to the incident that is the subject of this litigation.

1 secondary, and perhaps irrelevant and trivial details.”). See also *Safeco of America*
2 v. *Rawstron*, 181 F.R.D. 441, 447-48 (C.D. Cal. 1998); *Roberts v. Heim*, 130
3 F.R.D. 424, 427-28 (N.D. Cal. 1989) (same). Plaintiff further objects that this
4 interrogatory is compound, overly broad and vague and ambiguous. Plaintiff
5 further objects on the ground that this interrogatory calls for a legal conclusion and
6 on the ground that the information requested is in the possession of the Defendants.
7 Further, the depositions of the defendant officers and other witnesses have not been
8 completed and therefore this interrogatory is premature.

Discovery is ongoing and Plaintiff objects that the request is premature.

2 | Dated: February 8, 2019

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SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
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EXHIBIT 33

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CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA MARTINEZ; ISAAC ANTONIO LOPEZ CASTILLO; JOSUE VLADIMIR CORTEZ DIAZ; JOSUE MATEO LEMUS CAMPOS; MARVIN JOSUE GRANDE RODRIGUEZ; ALEXANDER ANTONIO BURGOS MEJIA; LUIS PENA GARCIA; JULIO CESAR BARAHONA CORNEJO, as individuals.

Plaintiffs,

V.

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals.

Defendants.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF ALEXANDER
ANTONIO BURGOS MEJIA'S
RESPONSES TO DEFENDANT
THE GEO GROUP, INC.'S
INTERROGATORIES, SET ONE**

1 **INTERROGATORY NO. 11:**

2 If you contend that you sustained emotional injuries as a result of the incident
 3 that is the subject of this litigation, please describe the nature of the emotional
 4 distress or psychological injury, the date and time when it was first experienced,
 5 and the name and address of every psychiatrist, counselor, therapist, psychologist,
 6 or social worker from whom he sought or obtained assistance.

7 **RESPONSE TO INTERROGATORY NO. 11:**

8 Plaintiff incorporates his general objections. Plaintiff further objects to this
 9 interrogatory to the extent it calls for information that will be the subject of expert
 10 disclosures. Plaintiff further objects that he is claiming only garden variety
 11 emotional distress and thus the information sought in this interrogatory is not
 12 proportional to the needs of the case. Subject to those objections, Plaintiff responds
 13 as follows: Mr. Mejia still has emotional distress to this day. He suffers from
 14 anxiety and worries that if he were detained he would be physically attacked again.
 15 He thinks about this every day. Mr. Mejia also saw a therapist at St. Mary Medical
 16 Center- Trauma Recovery Center in Long Beach. Mr. Mejia has also been working
 17 with a loss and trauma support group at Comunidades con Poder para el Cambio in
 18 Long Beach.

19

20 **INTERROGATORY NO. 12:**

21 Please identify, by name, address, and reason for treatment, all health care
 22 providers who have provided you with treatment of any kind since the incident that
 23 is the subject of this litigation.

24 **RESPONSE TO INTERROGATORY NO. 12:**

25 Plaintiff incorporates his general objections. Plaintiff further objects to this
 26 interrogatory on the ground of relevance, as overly broad and unduly burdensome,
 27 and to the extent it interrogatory calls for private and confidential medical
 28 information. Plaintiff objects to providing records of medical treatment unrelated

1 Plaintiff also notes that there is a list of demands that was given to the guards
 2 and incorporates that list by reference. A copy of that list has been provided at
 3 P000199-200.

4

5 **INTERROGATORY NO. 25:**

6 Please state all facts in support of your conspiracy claim.

7 **RESPONSE TO INTERROGATORY NO. 25:**

8 Plaintiff incorporates his general objections. Plaintiff objects to this
 9 interrogatory to the extent that it calls for all facts about Plaintiffs' claims. "State
 10 all facts" interrogatories of this kind are unduly burdensome, harassing, overly
 11 broad, and an improper use of the discovery process. *See IBP, Inc. v. Mercantile*
 12 *Bank of Topeka*, 179 F.R.D. 316, 321 (D. Kan. 1998) (providing "every fact" could
 13 require "laborious, time consuming analysis, search and description of incidental,
 14 secondary, and perhaps irrelevant and trivial details."). *See also Safeco of America*
 15 *v. Rawstron*, 181 F.R.D. 441, 447-48 (C.D. Cal. 1998); *Roberts v. Heim*, 130
 16 F.R.D. 424, 427-28 (N.D. Cal. 1989) (same). Plaintiff further objects that this
 17 interrogatory is compound, overly broad and vague and ambiguous. Plaintiff
 18 further objects on the ground that this interrogatory calls for a legal conclusion and
 19 on the ground that the information requested is in the possession of the Defendants.
 20 Further, the depositions of the defendant officers and other witnesses have not been
 21 completed and therefore this interrogatory is premature.

22

Discovery is ongoing and Plaintiff objects that the request is premature.

23

24

25

Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK

LAW OFFICE OF CAROL A. SOBEL

SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP

LAW OFFICE OF CYNTHIA ANDERSON-BARKER

LAW OFFICE OF MATTHEW STRUGAR

26

27

28

1 LAW OFFICE OF COLLEEN FLYNN
2
3
4

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7 By: /s/ Catherine Sweetser
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Attorneys for Plaintiffs

VERIFICATION

I, Alexander Antonio Burgos Mejia, am a Plaintiff in the within action. I am familiar with the contents of **Plaintiff Alexander Antonio Burgos Mejia's Responses to Defendant GEO GROUP, INC.'s Request for Interrogatories, Set One.** It is true of my own knowledge except as to matters which are stated on information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws the State of California that the foregoing is true and correct.

Executed on February 13, 2019, in Long beach, California.

Alexander Antonio Burgos Mejia

EXHIBIT 34

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Attorneys for Plaintiffs.

[Additional Counsel on Following Page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PEÑA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals.

Plaintiffs,

V

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals.

Defendants.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF OMAR
ARNOLDO RIVERA MARTINEZ'S
RESPONSES TO
DEFENDANT THE GEO GROUP,
INC.'S INTERROGATORIES, SET
ONE**

1 its frequency, and its duration.

2 **RESPONSE TO INTERROGATORY NO. 9:**

3 Plaintiff's nose is still injured, and he gets nose bleeds almost every day. In
4 the morning he wakes up with dry blood in and around his nose. It also makes it
5 difficult for him to breathe and to sleep. His nose is still fractured and visibly
6 crooked.

7

8 **INTERROGATORY NO. 10:**

9 If you contend that you will require any future health care treatment as a
10 result of the incident that is the subject of this litigation, please identify all medical
11 providers and/or witnesses who support your contention.

12 **RESPONSE TO INTERROGATORY NO. 10:**

13 Plaintiff incorporates his general objections. Plaintiff further objects that this
14 interrogatory calls for expert disclosures and conclusions prior to the time for
15 expert disclosures. Subject to those objections, Plaintiff responds as follows:

16 He will need surgery or some other medical treatment to repair his nose.
17 Plaintiff reserves the right to supplement this response at a later date.

18

19 **INTERROGATORY NO. 11:**

20 If you contend that you sustained emotional injuries as a result of the incident
21 that is the subject of this litigation, please describe the nature of the emotional
22 distress or psychological injury, the date and time when it was first experienced,
23 and the name and address of every psychiatrist, counselor, therapist, psychologist,
24 or social worker from whom he sought or obtained assistance.

25 **RESPONSE TO INTERROGATORY NO. 11:**

26 Plaintiff incorporates his general objections. Plaintiff further objects to this
27 interrogatory to the extent it calls for information that will be the subject of expert
28 disclosures. Plaintiff further objects that he is claiming only garden variety

1 emotional distress and thus the information sought in this interrogatory is not
2 proportional to the needs of the case. Subject to those objections, Plaintiff responds
3 as follows: Plaintiff experienced emotional distress when he was harmed by the
4 guards during the incident and while he was restricted in the segregation unit.
5 During his hunger strike he briefly spoke with a psychologist at Adelanto. After he
6 was released from segregation he experienced further emotional distress after he
7 was erroneously identified as the leader who incited a group demonstration and was
8 elevated to red jump suit and placed in a higher security ward. This ward housed
9 the violent gang members that he fled from when he left El Salvador. He feared for
10 his life and asked to see a psychologist at Adelanto. He explained that he feared for
11 his safety and he was later transferred to protective custody. He thinks about the
12 incident frequently and fears being detained by any agency ever again. Plaintiff has
13 not seen a mental health professional regarding this incident since the psychologist
14 he saw in the facility.

15

16 **INTERROGATORY NO. 12:**

17 Please identify, by name, address, and reason for treatment, all health care
18 providers who have provided you with treatment of any kind since the incident that
19 is the subject of this litigation.

20

RESPONSE TO INTERROGATORY NO. 12:

21 Plaintiff incorporates his general objections. Plaintiff further objects to this
22 interrogatory on the ground of relevance, as overly broad and unduly burdensome,
23 and to the extent it interrogatory calls for private and confidential medical
24 information. Plaintiff objects to providing records of medical treatment unrelated
25 to the injuries suffered in the incident. Plaintiff further objects that the records of
26 his medical treatment in the facility are more readily available to Defendant than to
27 Plaintiff. Subject to those objections, Plaintiff responds as follows:

28

Plaintiff saw a dentist in Ahuachapan, El Salvador who replaced his front

1 P000199-200.
2

3 **INTERROGATORY NO. 25:**

4 Please state all facts in support of your conspiracy claim.

5 **RESPONSE TO INTERROGATORY NO. 25:**

6 Plaintiff incorporates his general objections. Plaintiff objects to this
7 interrogatory to the extent that it calls for all facts about Plaintiffs' claims. "State
8 all facts" interrogatories of this kind are unduly burdensome, harassing, overly
9 broad, and an improper use of the discovery process. *See IBP, Inc. v. Mercantile*
10 *Bank of Topeka*, 179 F.R.D. 316, 321 (D. Kan. 1998) (providing "every fact" could
11 require "laborious, time consuming analysis, search and description of incidental,
12 secondary, and perhaps irrelevant and trivial details."). *See also Safeco of America*
13 *v. Rawstron*, 181 F.R.D. 441, 447-48 (C.D. Cal. 1998); *Roberts v. Heim*, 130
14 F.R.D. 424, 427-28 (N.D. Cal. 1989) (same). Plaintiff further objects that this
15 interrogatory is compound, overly broad and vague and ambiguous. Plaintiff
16 further objects on the ground that this interrogatory calls for a legal conclusion and
17 on the ground that the information requested is in the possession of the Defendants.
18 Further, the depositions of the defendant officers and other witnesses have not been
19 completed and therefore this interrogatory is premature.

20 Discovery is ongoing and Plaintiff objects that the request is premature.
21

22 Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK
LAW OFFICE OF CAROL A. SOBEL
SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
LAW OFFICE OF CYNTHIA ANDERSON-BARKER
LAW OFFICE OF MATTHEW STRUGAR
LAW OFFICE OF COLLEEN FLYNN

27 By: /s/ Catherine Sweetser
28 Attorneys for Plaintiffs

VERIFICATION

I, Omar Arnoldo Rivera Martinez, am a Plaintiff in the within action. I am familiar with the contents of **Plaintiff Omar Arnoldo Rivera Martinez's Responses to Defendant GEO GROUP, INC.'s Request for Interrogatories, Set One**. It is true of my own knowledge except as to matters which are stated on information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws the State of California that the foregoing is true and correct.

Executed on February 13, 2019, in Tijuana, Mexico.

Omar Arnoldo Rivera Martinez

EXHIBIT 35

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8 *Attorneys for Plaintiffs.*

9 *[Additional Counsel on Following Page]*

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20 OMAR ARNOLDO RIVERA
21 MARTINEZ; ISAAC ANTONIO
22 LOPEZ CASTILLO; JOSUE
23 VLADIMIR CORTEZ DIAZ; JOSUE
24 MATEO LEMUS CAMPOS;
25 MARVIN JOSUE GRANDE
26 RODRIGUEZ; ALEXANDER
27 ANTONIO BURGOS MEJIA; LUIS
28 PENA GARCIA; JULIO CESAR
 BARAHONA CORNEJO, as
 individuals,

29 Plaintiffs,

30 v.
31 THE GEO GROUP, Inc., a Florida
32 corporation; the CITY OF
33 ADELANTO, a municipal entity; GEO
34 LIEUTENANT DURAN, sued in her
35 individual capacity; GEO
36 LIEUTENANT DIAZ, sued in her
37 individual capacity; GEO
38 SERGEANT CAMPOS, sued in his
39 individual capacity; SARAH JONES,
40 sued in her individual capacity; THE
41 UNITED STATES OF AMERICA;
42 and DOES 1-10, individuals,

43 Defendants.

44 Case No. 5:18-cv-01125-R-GJS

45 **PLAINTIFF MARVIN
46 JOSUE GRANDE RODRIGUEZ's
47 RESPONSES TO DEFENDANT
48 THE GEO GROUP, INC.'S
49 INTERROGATORIES, SET ONE**

1 **INTERROGATORY NO. 10:**

2 If you contend that you will require any future health care treatment as a
3 result of the incident that is the subject of this litigation, please identify all medical
4 providers and/or witnesses who support your contention.

5 **RESPONSE TO INTERROGATORY NO. 10:**

6 Plaintiff incorporates his general objections. Plaintiff further objects that this
7 interrogatory calls for expert disclosures and conclusions prior to the time for
8 expert disclosures. Subject to those objections, Plaintiff responds as follows:

9 Plaintiff reserves the right to supplement this response at a later date.

10 **INTERROGATORY NO. 11:**

11 If you contend that you sustained emotional injuries as a result of the incident
12 that is the subject of this litigation, please describe the nature of the emotional
13 distress or psychological injury, the date and time when it was first experienced,
14 and the name and address of every psychiatrist, counselor, therapist, psychologist,
15 or social worker from whom he sought or obtained assistance.

16 **RESPONSE TO INTERROGATORY NO. 11:**

17 Plaintiff incorporates his general objections. Plaintiff further objects to this
18 interrogatory to the extent it calls for information that will be the subject of expert
19 disclosures. Plaintiff further objects that he is claiming only garden variety
20 emotional distress and thus the information sought in this interrogatory is not
21 proportional to the needs of the case. Subject to those objections, Plaintiff responds
22 as follows: Plaintiff has difficulty sleeping and stress and anxiety from the assault
23 and use of force against him. He also has ongoing headaches and feelings of
24 desperation. Plaintiff has not seen a mental health professional regarding this
25 incident since the psychologist he saw in the facility.

1 ignored for one or two days.

2 Plaintiff also notes that there is a list of demands that was given to the guards
3 and incorporates that list by reference. A copy of that list has been provided at
4 P000199-200.

5

6

7 **INTERROGATORY NO. 25:**

8 Please state all facts in support of your conspiracy claim.

9 **RESPONSE TO INTERROGATORY NO. 25:**

10 Plaintiff incorporates his general objections. Plaintiff objects to this
11 interrogatory to the extent that it calls for all facts about Plaintiffs' claims. "State
12 all facts" interrogatories of this kind are unduly burdensome, harassing, overly
13 broad, and an improper use of the discovery process. *See IBP, Inc. v. Mercantile*
14 *Bank of Topeka*, 179 F.R.D. 316, 321 (D. Kan. 1998) (providing "every fact" could
15 require "laborious, time consuming analysis, search and description of incidental,
16 secondary, and perhaps irrelevant and trivial details."). *See also Safeco of America*
17 *v. Rawstron*, 181 F.R.D. 441, 447-48 (C.D. Cal. 1998); *Roberts v. Heim*, 130
18 F.R.D. 424, 427-28 (N.D. Cal. 1989) (same). Plaintiff further objects that this
19 interrogatory is compound, overly broad and vague and ambiguous. Plaintiff
20 further objects on the ground that this interrogatory calls for a legal conclusion and
21 on the ground that the information requested is in the possession of the Defendants.
22 Further, the depositions of the defendant officers and other witnesses have not been
23 completed and therefore this interrogatory is premature.

24 Discovery is ongoing and Plaintiff objects that the request is premature.

25

26

27 Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK

28

LAW OFFICE OF CAROL A. SOBEL

1 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
2 LAW OFFICE OF CYNTHIA ANDERSON-BARKER
3 LAW OFFICE OF MATTHEW STRUGAR
4 LAW OFFICE OF COLLEEN FLYNN

5 By: /s/ Catherine Sweetser
6 *Attorneys for Plaintiffs*

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VERIFICATION

I, Marvin Grande Rodriguez, am a Plaintiff in the within action. I am familiar with the contents of **Plaintiff Marvin Grande Rodriguez's Responses to Defendant GEO GROUP, INC.'s Request for Interrogatories, Set One**. It is true of my own knowledge except as to matters which are stated on information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws the State of California that the foregoing is true and correct.

Executed on May 30, 2019, in Oakland, California.

Marvin Grande Rodriguez

EXHIBIT 36

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Attorneys for Plaintiffs.

[Additional Counsel on Following Page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PENA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals.

Plaintiffs.

V

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals.

Defendants.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF ISAAC ANTONIO
LOPEZ CASTILLO'S RESPONSES
TO DEFENDANT THE GEO
GROUP, INC.'S
INTERROGATORIES, SET ONE**

1 **INTERROGATORY NO. 9:**

2 Identify any injuries you contend you still have, which you attribute to the
3 incident which gave rise to this action, including a description of its present status,
4 its frequency, and its duration.

5 **RESPONSE TO INTERROGATORY NO. 9:**

6 Plaintiff still has back pain. It ranges from his neck to the middle of his back
7 and is at a scale of 6 on the pain scale almost daily. He feels more pain when he
8 walks or stands for long periods of time.

9

10 **INTERROGATORY NO. 10:**

11 If you contend that you will require any future health care treatment as a
12 result of the incident that is the subject of this litigation, please identify all medical
13 providers and/or witnesses who support your contention.

14 **RESPONSE TO INTERROGATORY NO. 10:**

15 Plaintiff incorporates his general objections. Plaintiff further objects that this
16 interrogatory calls for expert disclosures and conclusions prior to the time for
17 expert disclosures. Subject to those objections, Plaintiff responds as follows:

18 Plaintiff reserves the right to supplement this response at a later date.

19

20 **INTERROGATORY NO. 11:**

21 If you contend that you sustained emotional injuries as a result of the incident
22 that is the subject of this litigation, please describe the nature of the emotional
23 distress or psychological injury, the date and time when it was first experienced,
24 and the name and address of every psychiatrist, counselor, therapist, psychologist,
25 or social worker from whom he sought or obtained assistance.

26 **RESPONSE TO INTERROGATORY NO. 11:**

27 Plaintiff incorporates his general objections. Plaintiff further objects to this
28 interrogatory to the extent it calls for information that will be the subject of expert

1 disclosures. Plaintiff further objects that he is claiming only garden variety
2 emotional distress and thus the information sought in this interrogatory is not
3 proportional to the needs of the case. Subject to those objections, Plaintiff responds
4 as follows: Isaac feels anxious and afraid whenever he sees someone in uniform, as
5 it brings back memories of when he was detained and he fears going back. His
6 heart races, he feels faint, and he freezes. While detained at Adelanto, Plaintiff was
7 seen by a psychologist before the incident for anxiety and panic attacks he suffered
8 when confined in small places. Plaintiff also saw the psychologist after the incident
9 for an evaluation during his ongoing hunger strike. Plaintiff has not seen a mental
10 health professional regarding this incident since the psychologist he saw in the
11 facility.

12

13 **INTERROGATORY NO. 12:**

14 Please identify, by name, address, and reason for treatment, all health care
15 providers who have provided you with treatment of any kind since the incident that
16 is the subject of this litigation.

17

RESPONSE TO INTERROGATORY NO. 12:

18 Plaintiff incorporates his general objections. Plaintiff further objects to this
19 interrogatory on the ground of relevance, as overly broad and unduly burdensome,
20 and to the extent it interrogatory calls for private and confidential medical
21 information. Plaintiff objects to providing records of medical treatment unrelated
22 to the injuries suffered in the incident. Plaintiff further objects that the records of
23 his medical treatment in the facility are more readily available to Defendant than to
24 Plaintiff. Subject to those objections, Plaintiff responds as follows:

25

Plaintiff has not seen any providers since leaving the facility. Plaintiff did
26 see providers in the facility, and Defendant has those records equally available to
27 them.

28

1 interrogatory to the extent that it calls for all facts about Plaintiffs' claims. "State
2 all facts" interrogatories of this kind are unduly burdensome, harassing, overly
3 broad, and an improper use of the discovery process. *See IBP, Inc. v. Mercantile*
4 *Bank of Topeka*, 179 F.R.D. 316, 321 (D. Kan. 1998) (providing "every fact" could
5 require "laborious, time consuming analysis, search and description of incidental,
6 secondary, and perhaps irrelevant and trivial details."). *See also Safeco of America*
7 *v. Rawstron*, 181 F.R.D. 441, 447-48 (C.D. Cal. 1998); *Roberts v. Heim*, 130
8 F.R.D. 424, 427-28 (N.D. Cal. 1989) (same). Plaintiff further objects that this
9 interrogatory is compound, overly broad and vague and ambiguous. Plaintiff
10 further objects on the ground that this interrogatory calls for a legal conclusion and
11 on the ground that the information requested is in the possession of the Defendants.
12 Further, the depositions of the defendant officers and other witnesses have not been
13 completed and therefore this interrogatory is premature.

14 Discovery is ongoing and Plaintiff objects that the request is premature.
15
16

17 Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK
LAW OFFICE OF CAROL A. SOBEL
SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
LAW OFFICE OF CYNTHIA ANDERSON-BARKER
LAW OFFICE OF MATTHEW STRUGAR
LAW OFFICE OF COLLEEN FLYNN

22 By: /s/ Catherine Sweetser
23 *Attorneys for Plaintiffs*
24
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VERIFICATION

I, Isaac Antonio Lopez Castillo, am a Plaintiff in the within action. I am familiar with the contents of **Plaintiff Isaac Antonio Lopez Castillo's Responses to Defendant GEO GROUP, INC.'s Request for Production of Documents, Set One**. It is true of my own knowledge except as to matters which are stated on information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws the State of California that the foregoing is true and correct.

Executed on February 8, 2019, in Los Angeles, California.

Isaac Antonio Lopez Castillo

EXHIBIT 37

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(e) carolsobel@aol.com
(e) monique.alarcon8@gmail.com

Attorneys for Plaintiffs.

[Additional Counsel on Following Page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PEÑA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals.

Plaintiffs,

5

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals.

Defendants.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF JOSUE MATEO
LEMUS CAMPOS' RESPONSE TO
DEFENDANT THE GEO GROUP,
INC.'S INTERROGATORIES, SET
ONE**

1 **INTERROGATORY NO. 10:**

2 If you contend that you will require any future health care treatment as a
3 result of the incident that is the subject of this litigation, please identify all medical
4 providers and/or witnesses who support your contention.

5 **RESPONSE TO INTERROGATORY NO. 10:**

6 Plaintiff incorporates his general objections. Plaintiff further objects that this
7 interrogatory calls for expert disclosures and conclusions prior to the time for
8 expert disclosures. Subject to those objections, Plaintiff responds as follows:
9 Plaintiff is still suffering from emotional distress due to the incident and from
10 headaches. Plaintiff objects that it is premature to identify experts at this time.

12 **INTERROGATORY NO. 11:**

13 If you contend that you sustained emotional injuries as a result of the incident
14 that is the subject of this litigation, please describe the nature of the emotional
15 distress or psychological injury, the date and time when it was first experienced,
16 and the name and address of every psychiatrist, counselor, therapist, psychologist,
17 or social worker from whom he sought or obtained assistance.

18 **RESPONSE TO INTERROGATORY NO. 11:**

19 Plaintiff incorporates his general objections. Plaintiff further objects to this
20 interrogatory to the extent it calls for information that will be the subject of expert
21 disclosures. Plaintiff further objects that he is claiming only garden variety
22 emotional distress and thus the information sought in this interrogatory is not
23 proportional to the needs of the case. Subject to those objections, Plaintiff responds
24 as follows: Plaintiff is suffering from stress and anxiety due to the incident; he has
25 trauma from the incident and fears being detained again. He has also had
26 headaches stemming from the incident. Plaintiff has not seen a mental health
27 professional regarding this incident since the psychologist he saw in the facility.

1
2
3 Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK
LAW OFFICE OF CAROL A. SOBEL
SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
LAW OFFICE OF CYNTHIA ANDERSON-BARKER
LAW OFFICE OF MATTHEW STRUGAR
LAW OFFICE OF COLLEEN FLYNN

7
8 By: /s/ Catherine Sweetser
9 *Attorneys for Plaintiffs*

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VERIFICATION

I, Mateo Lemus Campos, am a Plaintiff in the within action. I am familiar with the contents of **Mateo Lemus Campos' Responses to Defendant GEO GROUP, INC.'s Request for Interrogatories, Set One**. It is true of my own knowledge except as to matters which are stated on information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws the State of California that the foregoing is true and correct.

Executed on April 28, 2019, in Los Angeles, California.

Mateo Lemus Campos

EXHIBIT 38

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Attorneys for Plaintiffs.

[Additional Counsel on Following Page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA MARTINEZ; ISAAC ANTONIO LOPEZ CASTILLO; JOSUE VLADIMIR CORTEZ DIAZ; JOSUE MATEO LEMUS CAMPOS; MARVIN JOSUE GRANDE RODRIGUEZ; ALEXANDER ANTONIO BURGOS MEJIA; LUIS PENA GARCIA; JULIO CESAR BARAHONA CORNEJO, as individuals.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF JULIO CESAR
BARAHONA CORNEJO
RESPONSE TO DEFENDANT THE
GEO GROUP, INC.'S
INTERROGATORIES, SET ONE**

Plaintiffs.

V.

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals.

Defendants.

1 **RESPONSE TO INTERROGATORY NO. 9:**

2 Plaintiff still suffers from knee pain in the cold or while walking.

3

4 **INTERROGATORY NO. 10:**

5 If you contend that you will require any future health care treatment as a
6 result of the incident that is the subject of this litigation, please identify all medical
7 providers and/or witnesses who support your contention.

8 **RESPONSE TO INTERROGATORY NO. 10:**

9 Plaintiff incorporates his general objections. Plaintiff further objects that this
10 interrogatory calls for expert disclosures and conclusions prior to the time for
11 expert disclosures. Subject to those objections, Plaintiff responds as follows:

12 Plaintiff intends to see a doctor for his knee but has not yet done so.

13

14 **INTERROGATORY NO. 11:**

15 If you contend that you sustained emotional injuries as a result of the incident
16 that is the subject of this litigation, please describe the nature of the emotional
17 distress or psychological injury, the date and time when it was first experienced,
18 and the name and address of every psychiatrist, counselor, therapist, psychologist,
19 or social worker from whom he sought or obtained assistance.

20 **RESPONSE TO INTERROGATORY NO. 11:**

21 Plaintiff incorporates his general objections. Plaintiff further objects to this
22 interrogatory to the extent it calls for information that will be the subject of expert
23 disclosures. Plaintiff further objects that he is claiming only garden variety
24 emotional distress and thus the information sought in this interrogatory is not
25 proportional to the needs of the case. Subject to those objections, Plaintiff responds
26 as follows: Plaintiff still has emotional distress from the incident; he thinks of it
27 often and it is very upsetting. He remembers the pain clearly and being defenseless,
28 and seeing and hearing his friends their pain. The memories come back to him

1 repeatedly and frequently. Plaintiff has not seen a mental health professional
2 regarding this incident since the psychologist he saw in the facility.
3

4 **INTERROGATORY NO. 12:**

5 Please identify, by name, address, and reason for treatment, all health care
6 providers who have provided you with treatment of any kind since the incident that
7 is the subject of this litigation.

8 **RESPONSE TO INTERROGATORY NO. 12:**

9 Plaintiff incorporates his general objections. Plaintiff further objects to this
10 interrogatory on the ground of relevance, as overly broad and unduly burdensome,
11 and to the extent it interrogatory calls for private and confidential medical
12 information. Plaintiff objects to providing records of medical treatment unrelated
13 to the injuries suffered in the incident. Plaintiff further objects that the records of
14 his medical treatment in the facility are more readily available to Defendant than to
15 Plaintiff. Subject to those objections, Plaintiff responds as follows:

16 Plaintiff has not seen a medical professional regarding this incident since he
17 left the facility.
18

19 **INTERROGATORY NO. 13:**

20 Please identify, by health care provider, date of service, amount of charges,
21 amounts paid, and amount all special damages for health care treatment that you
22 contend are attributable to the incident that is the subject of this litigation.

23 **RESPONSE TO INTERROGATORY NO. 13:**

24 Plaintiff incorporates his general objections. Plaintiff further objects that this
25 interrogatory calls for expert disclosures and conclusions prior to the time for
26 expert disclosures. Discovery is ongoing and Plaintiff may supplement these
27 responses at a later date. Subject to those objections, Plaintiff responds as follows:
28

1 Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK
LAW OFFICE OF CAROL A. SOBEL
SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
LAW OFFICE OF CYNTHIA ANDERSON-BARKER
LAW OFFICE OF MATTHEW STRUGAR
LAW OFFICE OF COLLEEN FLYNN

6 By: /s/ Catherine Sweetser
7 *Attorneys for Plaintiffs*

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1 **VERIFICATION**
2

3 I, Julio Cesar Barahona Cornejo, am a Plaintiff in the within action. I am
4 familiar with the contents of Plaintiff **Julio Cesar Barahona Cornejo's**
5 **Responses to Defendant GEO GROUP, INC.'s Request for Interrogatories, Set**
6 **One.** It is true of my own knowledge except as to matters which are stated on
7 information and believe, and as to those I believe them to be true.

8
9 I declare under penalty of perjury under the laws the State of California that
10 the foregoing is true and correct.

11
12 Executed on February 8 2019, in Miraloma, California.

13
14 
15 Julio Cesar Barahona Cornejo

EXHIBIT 39

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[Additional Counsel on Following Page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PENA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

V.

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals,

Defendants.

Case No. 5:18-cv-01125-R-GJS

**PLAINTIFF JOSUE
VLADIMIR CORTEZ DIAZ'
RESPONSES TO
DEFENDANT THE GEO GROUP,
INC.'S INTERROGATORIES, SET
ONE**

1 **INTERROGATORY NO. 9:**

2 Identify any injuries you contend you still have, which you attribute to the
3 incident which gave rise to this action, including a description of its present status,
4 its frequency, and its duration.

5 **RESPONSE TO INTERROGATORY NO. 9:**

6 Plaintiff still has headaches once or twice a week and nightmares about the
7 incident roughly twice a month. The headaches sometimes are severe enough to
8 make him nauseous.

9

10 **INTERROGATORY NO. 10:**

11 If you contend that you will require any future health care treatment as a
12 result of the incident that is the subject of this litigation, please identify all medical
13 providers and/or witnesses who support your contention.

14 **RESPONSE TO INTERROGATORY NO. 10:**

15 Plaintiff incorporates his general objections. Plaintiff further objects that this
16 interrogatory calls for expert disclosures and conclusions prior to the time for
17 expert disclosures. Subject to those objections, Plaintiff responds as follows:

18 Plaintiff reserves the right to update this response at a later date.

19

20 **INTERROGATORY NO. 11:**

21 If you contend that you sustained emotional injuries as a result of the incident
22 that is the subject of this litigation, please describe the nature of the emotional
23 distress or psychological injury, the date and time when it was first experienced,
24 and the name and address of every psychiatrist, counselor, therapist, psychologist,
25 or social worker from whom he sought or obtained assistance.

26 **RESPONSE TO INTERROGATORY NO. 11:**

27 Plaintiff incorporates his general objections. Plaintiff further objects to this
28 interrogatory to the extent it calls for information that will be the subject of expert

1 disclosures. Plaintiff further objects that he is claiming only garden variety
2 emotional distress and thus the information sought in this interrogatory is not
3 proportional to the needs of the case. Subject to those objections, Plaintiff responds
4 as follows: Plaintiff has not seen a mental health professional regarding this
5 incident since the psychologist he saw in the facility. Plaintiff saw the psychologist
6 multiple times in the facility.

7

8 **INTERROGATORY NO. 12:**

9 Please identify, by name, address, and reason for treatment, all health care
10 providers who have provided you with treatment of any kind since the incident that
11 is the subject of this litigation.

12 **RESPONSE TO INTERROGATORY NO. 12:**

13 Plaintiff incorporates his general objections. Plaintiff further objects to this
14 interrogatory on the ground of relevance, as overly broad and unduly burdensome,
15 and to the extent it interrogatory calls for private and confidential medical
16 information. Plaintiff objects to providing records of medical treatment unrelated
17 to the injuries suffered in the incident. Plaintiff further objects that the records of
18 his medical treatment in the facility are more readily available to Defendant than to
19 Plaintiff. Subject to those objections, Plaintiff responds as follows:

20 Plaintiff has not obtained health care treatment outside the facility.

21

22 **INTERROGATORY NO. 13:**

23 Please identify, by health care provider, date of service, amount of charges,
24 amounts paid, and amount all special damages for health care treatment that you
25 contend are attributable to the incident that is the subject of this litigation.

26 **RESPONSE TO INTERROGATORY NO. 13:**

27 Plaintiff incorporates his general objections. Plaintiff further objects that this
28 interrogatory calls for expert disclosures and conclusions prior to the time for

1 Further, the depositions of the defendant officers and other witnesses have not been
2 completed and therefore this interrogatory is premature.

3 Discovery is ongoing and Plaintiff objects that the request is premature.

4

5

6 Dated: February 8, 2019

LAW OFFICE OF RACHEL STEINBACK
LAW OFFICE OF CAROL A. SOBEL
SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
LAW OFFICE OF CYNTHIA ANDERSON-BARKER
LAW OFFICE OF MATTHEW STRUGAR
LAW OFFICE OF COLLEEN FLYNN

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By: /s/ Catherine Sweetser
Attorneys for Plaintiffs

VERIFICATION

I, José Bladimir Cortéz Diaz, am a Plaintiff in the within action. I am familiar with the contents of Plaintiff José Bladimir Cortéz Diaz's Responses to Defendant GEO GROUP, INC.'s Request for Interrogatories, Set One. It is true of my own knowledge except as to matters which are stated on information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws the State of California that the foregoing is true and correct.

Executed on February 3, 2019, in Fillmore, California.

José Bladimir Cortéz Diaz

EXHIBIT 40

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6 Attorneys for Defendants
7 THE GEO GROUP, INC., DIAZ, CAMPOS, CITY
OF ADELANTO and DURAN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

12 OMAR ARNOLDO RIVERA
13 MARTINEZ; ISAAC ANTONIO
14 LOPEZ CASTILLO; JOSUE
15 VLADIMIR CORTEZ DIAZ; JOSUE
16 MATEO LEMUS CAMPOS;
17 MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PEÑA GARCIA; JULIO CESAR
BARAHONA CÓRNEJO, as
individuals,

18 Plaintiffs,

19 v.
20 THE GEO GROUP, Inc., a Florida
21 corporation; the CITY OF
22 ADELANTO, a municipal entity; GEO
23 LIEUTENANT DURAN, sued in her
24 individual capacity; GEO
25 LIEUTENANT DIAZ, sued in her
individual capacity; GEO
SERGEANT CAMPOS, sued in his
individual capacity; SARAH JONES,
sued in her individual capacity; THE
UNITED STATES OF AMERICA;
and DOES 1-10, individuals.

20 Defendants.

28 | //

RECEIVED
JUL 12 2019

Case No. 5:18-cv-01125-R-GJS

**DEFENDANT GEO GROUP, INC.'S
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS,
SET FOUR**

Judge: Honorable R. Gary Klausner

1 Except for explicit facts admitted herein, no admissions of any nature
 2 whatsoever are implied or should be inferred. The defendants reserve the right to
 3 refer to, conduct discovery with reference to, or offer into evidence at trial any and
 4 all such witnesses, facts and evidence, notwithstanding the absence of reference to
 5 such witnesses, facts and evidence in these responses. Finally, because some of
 6 these responses may have been ascertained by defendants' attorneys and
 7 investigators, defendants may not have personal knowledge of the information from
 8 which such responses were derived.

9 This preliminary statement is incorporated into each of the responses set
 10 forth below. Defendants' investigation of this matter is continuing and they,
 11 accordingly, reserve the right to update, or amend, this response as further and/or
 12 more specific information is acquired and also reserves the right to supplement this
 13 response at a later time.

14 **REQUEST NO. 79:**

15 Any and all documents and/or records relating to daily logs and/or
 16 summaries and/or volume measurements of each OC Spray canister carried by
 17 Lieutenant Diaz and/or Sergeant Campos from May 12, 2017 to June 13, 2017.

18 **RESPONSE TO REQUEST NO. 79:**

19 Objections: This request is vague and ambiguous as to the terms "records
 20 related to daily logs," "summaries," and "volume measurements," and overbroad as
 21 to time and scope. This request seeks information which is irrelevant and unlikely
 22 to lead to the discovery of admissible evidence. This request assumes facts not in
 23 evidence and, thus, lacks foundation. This request is harassing, unduly burdensome
 24 and oppressive. This request is compound.

25 Subject to and without waiving the foregoing objections, Defendant responds
 26 as follows: To the extent that there are responsive, non-privileged documents from
 27 June 12, 2017, related to the OC spray canisters carried by Lt. Diaz and Sgt.
 28 Campos during the incident, Defendant will produce them.

1 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 79:**

2 Objections: This request is vague and ambiguous as to the terms "records
 3 related to daily logs," "summaries," and "volume measurements," and overbroad as
 4 to time and scope. This request seeks information which is irrelevant and unlikely
 5 to lead to the discovery of admissible evidence. This request assumes facts not in
 6 evidence and, thus, lacks foundation. This request is harassing, unduly burdensome
 7 and oppressive. This request is compound.

8 Subject to and without waiving the foregoing objections, Defendant responds
 9 as follows: After diligent search and a reasonable inquiry were made in an effort to
 10 comply with this demand, Defendant GEO was unable to locate any responsive
 11 materials.

12 **REQUEST NO. 80:**

13 Any and all documents and/or records relating to each Lieutenant's (also
 14 known as "watch commander" or "shift supervisor") end-of-shift reports that are
 15 completed at the end of each shift and saved in GEO Group's records from May 12,
 16 2017 to July 12, 2017.

17 **RESPONSE TO REQUEST NO. 80:**

18 Objections: This request is vague and ambiguous, and overbroad as to time
 19 and scope. This request seeks information which is irrelevant and unlikely to lead
 20 to the discovery of admissible evidence. This request assumes facts not in evidence
 21 and, thus, lacks foundation.

22 Subject to and without waiving the foregoing objections, Defendant responds
 23 as follows: To the extent that there are responsive, non-privileged "end-of-shift
 24 reports" dated June 12, 2017, that are related to the incident, Defendant will
 25 produce them.

26 ///

27 ///

28 ///

Subject to and without waiving the foregoing objections, Defendant responds as follows: Defendant GEO refers Plaintiffs to Bates stamp nos.: GEO 05199-05207, which consists of non-privileged “communications between dorm officers and Command Staff regarding daily logs taken at the ‘East 2-C’ dorm at Adelanto Processing Center” dated June 12, 2017.

Dated: July 10, 2019

BURKE, WILLIAMS & SORENSEN, LLP

By:

Susan E. Coleman
Kristina Doan Strottman
Carmen M. Aguado

Attorneys for Defendants
THE GEO GROUP, INC., DIAZ,
CAMPOS, CITY OF ADELANTO and
DURAN

EXHIBIT 41



Nicole Ramos
Project Director
Border Rights Project

July 5, 2017

U.S. Department of Homeland Security
Office for Civil Rights and Civil Liberties
Compliance Branch
245 Murray Lane, SW
Building 410, Mail Stop #0190
Washington, D.C. 20528

**RE: Omar Arnoldo Rivera Martinez (A#213-081-649)
Josue Mateo Lemus Campos (A#213-078 -965)**

Dear CRCL Compliance Branch Officer:

I represent Omar Rivera Martinez and Josue Mateo Lemus Campos, two Salvadoran asylum seekers now detained in the Adelanto Detention Facility. I write now to request that your office *immediately* investigate unlawful retaliation taken against my clients, subsequent to my filing of two Civil Rights Civil Liberties complaints with your office on June 22, 2017.

Background

Since filing two Civil Rights complaints against the Adelanto Detention Facility and ICE, counsel's telephone number has been blocked, thus preventing Mr. Rivera Martinez and Mr. Lemus Campos from communicating with counsel. This block took effect on or around June 30, 2017. Counsel learned of the block only after Mr. Rivera Martinez contacted another member of the legal advocacy team. Attached please find a recording of Mr. Rivera Martinez's statement regarding the block.

Steps Taken By Counsel to Resolve the Problem & Response of the Institutional

On July 1, 2017, counsel contacted TelMate, the company that provides payphone service to the Adelanto Detention Facility. After speaking with a TelMate representative, counsel learned that the block placed on counsel's telephone number originated with the institution.



Nicole Ramos
Project Director
Border Rights Project

Following, counsel contacted the Adelanto Detention Facility, and was advised that the only reason that the facility would place a block on counsel's telephone number would be if counsel had initiated a three-way conference call with a third party. However, counsel advised the attending officer that counsel is aware of the rule against three-way telephone calls, and had, at no point, initiated such a call. Counsel was then advised to contact the facility on Monday and to speak with someone in the security department.

On Monday, July 3, 2017, counsel spoke with Lieutenant Belt of the Adelanto Detention Facility regarding the block. Lieutenant Belt advised counsel that the facility would investigate the block, and that someone would respond to counsel's complaint regarding this issue.

Later, on July 3, 2017, counsel received a voicemail message from Lieutenant Belt stating that he was not *authorized* to discuss this matter further, and that counsel must seek resolution by contacting ICE, the Office of Chief Counsel, or the Warden's Office. This response is particularly perplexing given that Lieutenant Belt's department within the facility is charged with the authority and responsibility of placing blocks on detainee telephone accounts.

On July 5, 2017, counsel left a voicemail for Lieutenant Belt to clarify the facility's position regarding its inability to respond to counsel's request for information. As of the time of this filing, counsel has not received a response.

Following, counsel contacted the Adelanto Detention Facility and requested to speak with the warden or the warden's assistant. "Joanne" who declined to provide her full name, but did indicate that she worked for the warden, advised that no one at the facility could respond to counsel's inquiry, and that counsel must contact ICE. Counsel explained to "Joanne" that, per Telmate, the block originated with the facility. However, "Joanne" was clear—that any block on counsel's telephone number must be resolved through ICE.

Following, counsel emailed Assistant Field Office Director, Gabriel Valdez and Deportation Officer, Chris Barth, regarding the block on counsel's telephone number. As of the time of this filing counsel has not received any response to counsel's inquiry and request to remove the block.

Investigation & Action Steps Requested

This interference with attorney-client communication is unacceptable, and violates the *Orantes* injunction. Under *Orantes*, ICE is required to ensure the privacy of attorney-client



Nicole Ramos
Project Director
Border Rights Project

communications, to refrain from taking measures which impede access to counsel, and to ensure adequate telephone access to counsel. Mr. Rivera Martinez and Mr. Lemus Campos have been blocked from contacting counsel for *six days*.

Counsel requests immediate action; specifically that ICE and Adelanto Detention Facility be directed to immediately remove the block on counsel's telephone number, and to desist in further retaliatory conduct. Counsel further requests immediate investigation into the facility's decision to block counsel's phone number. It is concerning that this action comes *after* counsel filed a Civil Rights complaint against ICE and the facility in connection with an attack of Mr. Rivera Martinez and Mr. Lemus Campos by GEO guards on June 12, 2017. Finally, counsel requests that Mr. Rivera Martinez and Mr. Lemus Campos be released immediately on humanitarian parole. Both continue to face retaliation, and are not safe in detention, particularly now that access to counsel has been blocked.

Respectfully,

Nicole Ramos

Nicole Ramos | Project Director | Al Otro Lado | Border Rights Project
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